

PHOTOGRAPHS



Facility: Allied Signal -  
Detroit Tar Plant  
Location: Detroit, Michigan  
Photographer: Gail Artrip  
Camera: Canon GIII  
Film: Kodak ISO 200  
Date: July 30, 1992

Photo No.: 1

Portion of Baie Comeau pitch piles, no longer manufactured by Allied Signal.

Photo No.: 2

Photo shows crushed rock/dirt ground with typical ponding. Note the presence of dark liquids in pond.





Photo No.: 3

Containment diking along the River Rouge.

Photo No.: 4

One of the rail tankers near the center of the property shown in front of some of the coal tar feedstock tanks.



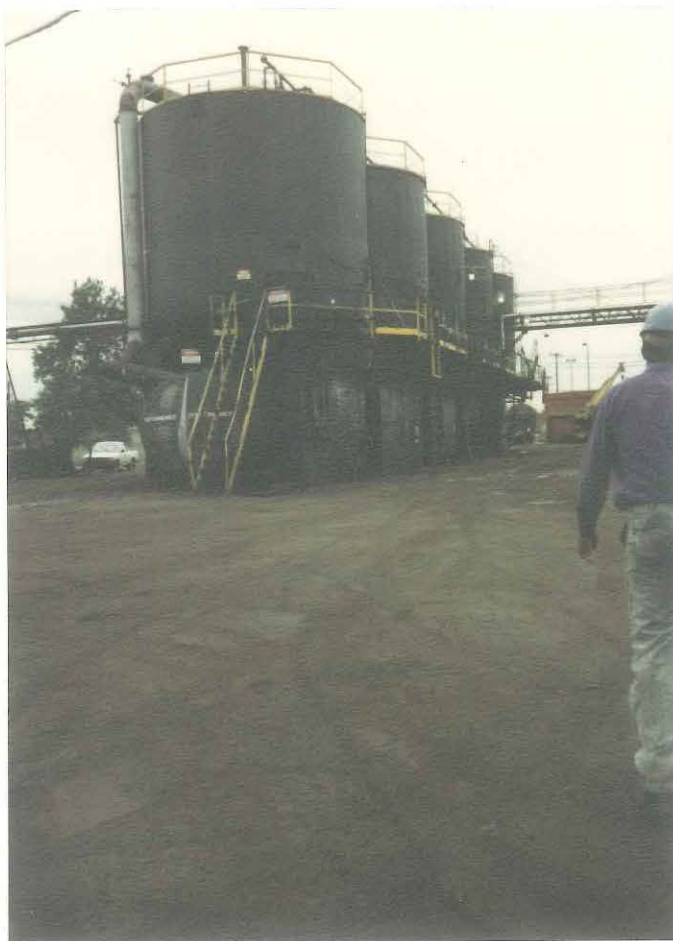


Photo No.: 5

Storage tanks for debris-containing coal tar prior to introduction into the filter press and dephenolizer.



AlliedSignal Inc.  
Law Department  
P.O. Box 2245  
Morristown, NJ 07962-2245

March 2, 1995

Via Overnight Delivery

Ms. Marietta Newell  
Air Toxics and Radiation Branch (AT-18J)  
Air and Radiation Division  
Region V  
United States Environmental Protection Agency  
77 West Jackson Blvd.  
Chicago, IL 60604

**RECEIVED**  
MAR 03 1995  
AIR TOXICS AND RADIATION  
BRANCH  
U.S. EPA, REGION V

Re: CAA § 114(a) Request for Information from AlliedSignal Inc.'s Detroit Tar Plant

Dear Ms. Newell:

As is AlliedSignal's normal practice in responding to Agency requests for information, the above-referenced request, which was received by the Detroit Plant on February 6, 1995, has been referred to the undersigned for further handling. In accordance with a telephone conversation which took place between Mr. Jeffrey Gahrns of your staff and Mr. Bill Yanovitch of AlliedSignal on February 23, 1995, the date by which AlliedSignal's response to the request is due is March 3, 1995.

Responses to the request are set forth in an attachment to this letter. These responses were prepared on the basis of information provided by AlliedSignal personnel having knowledge of the Detroit Plant and its processes. Inasmuch as AlliedSignal is unaware of any statutory or regulatory authority that requires the Detroit Plant to provide the certification requested on page two of the request document signed by Mr. Kee, such certification is not set forth in AlliedSignal's response.

Should you have any questions concerning this matter, please do not hesitate to contact me at (201) 455-4033.

Very truly yours,

Gordon D. Quin  
Senior Counsel

c: Rajendra Sinha, Chief  
Wayne County Health Department  
Air Quality Division

## ATTACHMENT

### 1. Response to Request Number 1

Since approximately 1917, the Detroit Tar Plant ("Plant") has been refining crude coal tar, a material produced by the thermal distillation of coal in coke ovens. The final products from the refining process are electrode binder or anode pitch, roofing pitch, specialty pitches, driveway sealer tar base, creosote solution and carbolic oil. Units currently involved in manufacturing operations at the Plant are identified and described in the five subsections below. Attachment 1 contains several diagrams of the Plant site and the manufacturing process.

#### **A. Continuous Coal Tar Distillation Unit ("Tar Heater")**

Construction/operation of this unit began in 1955.

The tar heater distills coal tar continuously through two distillation columns. A single furnace provides heat for both columns in the tar heater. The first of the two columns (the "DH column") dehydrates the crude coal tar and then feeds the dehydrated tar to the tar heater vapor box ("THVB"). The THVB is used to flash lighter oils while retaining heavier pitch type materials. Oils are condensed and separated into various cuts in the tar distillation column.

Further separation of heavier materials in the THVB can be accomplished in the low temperature distillation system ("LTD"), which consists of another vapor box attached to a vacuum system. The LTD allows separation to occur at lower temperatures. When the THVB is run at higher temperatures, the LTD system can be bypassed (referred to as a "straight run").

#### **B. Batch Stills**

Construction/operation of these units began in approximately 1917.

The plant has three batch stills. These units operate by adding approximately 10,000 gallons of tar feed and underfiring the still until the desired softening point is reached. Flashed oils are condensed in one receiver tank without using a distillation column. The batch stills are the secondary means of production at the plant.

#### **C. Roofing Pitch Barreling Operation**

Construction/operation of the barreling system began in approximately 1917. The system was completely updated in 1994.



#### D. Storage Tanks

Set forth in Attachment 1 is a listing of current tanks which shows the contents, construction date and capacity of each tank.

#### F. Loading/Unloading Operations

Crude coal tar is received by barge at the dock facility, and by tank truck at two unloading stations and by railcar at nine unloading stations.

Pitch loading of railcars occurs at two locations. Tank trucks are loaded with pitch at six stations. Refined tar is loaded into tank trucks at three locations. Creosote and other tar cuts, excluding pitch, are loaded into tank cars at 13 locations.

Drummed products are shipped by flatbed truck.

#### 2. Response to Request Numbers 2, 3 and 4

Attachment 2 consists of a table which summarizes the information requested in Request Numbers 2, 3 and 4. Not included in this summary is the Plant's former filter press operation, which was constructed/operated in 1989 and shut down indefinitely in 1991. Information on tank capacities is provided in Attachment 1. The organic polynuclear portion of VOC emissions has a "tar like" odor. Normal variability in the operation of combustion sources can result in visible emissions. Start up or upset conditions have the potential to result in high opacity.

#### 3. Response to Request Number 5

Attachment 5 provides information on control devices for process equipment. The Plant has thus far been unable to locate the original manufacturer's design control efficiency data for the scrubbers.

#### 4. Response to Request Number 6

Based on AP-42 emission calculations, estimated control efficiencies are provided in Attachment 6. These calculations were previously submitted with permit applications. No stack testing has been performed on the scrubbers.

#### 5. Response to Request Number 7

The tar distillation unit has continuous monitors for temperature, pressure and flow rate. The batch stills have continuous temperature monitors. The range for any particular parameter will vary depending on raw material quality and product being produced. The result is a set of ranges that is too long to include in this response. Charts of process monitoring data are available at the Plant site for Agency inspection.

6. Response to Request Number 8

Operating practices that are employed to reduce emissions include: control of tank temperature; limiting time for sample procurement from sample vents; tightening of pump and valve packings.

All scrubbers are monitored daily for temperature and discharge pressure psig. More detailed checks are conducted weekly. The audit sheets used for these inspections are set forth in Attachment 8 and indicate the acceptable range for operating parameters. The magnitude of events outside of the operating range is almost always <10% above or below the limit. Occasional high temperature variations of this sort have been noted over the past three months. All daily and weekly check sheets are available for the Agency's inspection at the Plant.

7. Response to Request Number 9

Copies of current air emission operating permits, construction permits and certificates of operation are set forth in Attachment 9.

8. Response to Request Number 10

Recent suppliers of coal tar processed at the Plant include the following:

- A. National Steel Corp.  
Ecourse, MI
- B. Detroit Coke  
Detroit, MI
- C. Tonawanda Coke Corp.  
Tonawanda, NY
- D. Bethlehem Steel  
Lackawana, NY
- E. Koppers Industries  
Toledo, OH
- F. DoFasco, Inc.  
Hamilton, Ont.
- G. Algoma Steel  
Saulte St. Marie, Ont.



H. U.S. Steel  
Gary, IN

I. AK Steel  
Middletown, OH

J. LTV Steel  
Warren, OH

K. Stelco Inc.  
Nanticoke, Ont.

L. Protexa  
Montcloya, Mexico

M. Sloss Industries  
Birmingham, AL

N. Reilly Industries  
Cleveland, OH

O. Inland Steel  
East Chicago, IN

Materials occasionally processed by the Plant in the past for use as raw materials include tar oil, water gas tar, crude oil tank bottoms and driveway sealer. In 1992, a quantity of waste cooking oil which the Plant was unable to burn in its fluidized bed boiler was used as a raw material. Clean out materials from barges used by AlliedSignal to transport crude coal tar are used by the Plant as a raw material.

Crude coal tar is the only material currently being processed in the Plant. Responsive documents pertaining to the testing of these materials are set forth in Attachment 10.

9. Response to Request Number 11

Attachment 11 includes three diagrams which indicate the location of stacks and pressure relief valves. Data on stacks are as follows:

Batch stills	- 50' high	30" diameter
Tar heater	- ~81' high	54" diameter
York-Shipley/FBB	- 152' high	36" diameter

10. Response to Request Number 12

Sources of fugitive emissions include: pumps, valves and flanges on transfer lines, as well as sampling ports on tanks and loading/unloading losses (including barreling).

EPCRA § 313 Form R data for 1993 indicate the following compounds and estimated fugitive emission releases:

Benzene	5490	pounds
Naphthalene	10070	pounds
Dibenzofuran	2353	pounds
Quinoline	360	pounds
Toluene	1690	pounds
Xylene	880	pounds
Styrene	341	pounds
Creosote	3016	pounds
Anthracene	1740	pounds

Elements of the Plant's program to reduce fugitive emissions include:

- Routine maintenance of pump and valve packings
- Historical installation of scrubbers at certain loading stations
- Reduction of sample volume/time required for sampling
- Maintenance of low tank/operating temperatures

11. Response to Request Number 13

Fuels currently used in the Plant's combustion sources are tar oils produced on-site and commercially purchased Number 6 fuel oil.

12. Response to Request Number 14

Odors are not subject to Agency jurisdiction through the Michigan State Implementation Plan, which is the purported focus of this request for information. The Plant has received two indirect odor complaints in the past six months via the Wayne County Health Department ("WCHD"). Any further information on this issue should be obtained from the WCHD.

13. Response to Request Number 15

Attachment 15 contains the March 18, 1991 WCHD APCD request for a Malfunction Abatement Plan for the fluidized bed boiler and the Plant's response to that request. Malfunctions during the past 12 months were limited to the FBB and ancillary equipment resulting in elevated opacity readings. During February 1994, there were 10 high opacity incidents. Three of these incidents were due to baghouse problems and seven

were attributed to fuel problems. In each case, appropriate steps were taken to alleviate the problem, up to and including shutdown of the FBB. Also included in Attachment 15 is a copy of the March 29, 1994 Quarterly Excess Opacity Report submitted to WCHD.

14. Response to Request Number 16

In accordance with the order contained in Attachment 16, Plant paved areas are swept twice weekly by an outside contractor. The on-site employee parking lot (approximately 3300 square yards) is sprayed with "Dust Bond" by Cousins Waste Control. Records of these activities are maintained at the Plant.





AlliedSignal Inc.  
Law Department  
P.O. Box 2245  
Morristown, NJ 07962-2245

February 24, 1995

Via Overnight Delivery

Mr. Michael Cunningham  
RCRA Enforcement Branch (HRE-8J)  
Region V  
United States Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**RECEIVED**  
FEB 27 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Re: RCRA § 3007 Request for Information From AlliedSignal Inc.'s Detroit Tar Plant

Dear Mr. Cunningham:

As is AlliedSignal's normal practice in responding to Agency requests for information, the above-referenced request, which was received by the Detroit Plant on February 6, 1995, has been referred to the undersigned for further handling.

Responses to the request are set forth in an attachment to this letter. These responses were prepared on the basis of information provided by AlliedSignal personnel having knowledge of the Detroit Plant and its processes. Inasmuch as AlliedSignal is unaware of any statutory or regulatory authority which requires a non-RCRA permitted facility such as the Detroit Plant to provide the certification requested in Request Number 12, such certification is not set forth in AlliedSignal's response.

Should you have any questions concerning this matter, please do not hesitate to contact me at (201) 455-4033.

Very truly yours,

Gordon D. Quin  
Senior Counsel



## ATTACHMENT

### 1. Response to Request Number 1

Since approximately 1917, the Detroit Tar Plant ("Plant") has been refining crude coal tar, a material produced by the thermal distillation of coal in coke ovens. Neither the refining process, nor the products produced from that process, have changed significantly over the last several decades. The final products from the refining process are electrode binder or anode pitch, roofing pitch, specialty pitches, driveway sealer tar base, creosote solution and carbolic oil.

Crude coal tar is shipped to the Plant in rail cars, trucks and barges and stored in a number of on-site storage tanks. From this tank storage area, crude coal tar, supplemented with certain proprietary oils used for quinoline insoluble adjustment, are conveyed to either the continuous coal tar distillation unit ("Tar Heater") or to one of three batch stills.

The three batch stills operate by adding approximately 10,000 gallons of tar to a still and heating the material by underfiring the still until the desired softening point is reached. All the oils are collected within one tank. There is no distillation column on the batch stills.

The Tar Heater distills coal tar continuously through two distillation columns. A furnace, divided into two sections, provides the heat input. The first column is a dehydration ("DH") column and removes any water entrained in the crude tar. The dehydrated tar is then flashed in a Tar Heater Vapor Box ("THVB"). The high boiling point material is primarily pitch and remains as a liquid in the vapor box. The oils flash, remain as vapor and pass into the tar distillation ("TH") column, where the oils are separated into materials with various boiling points. Additional low boiling point materials in the liquid in the THVB can be further removed by the Low Temperature Distillation ("LTD") system. The LTD system consists of another vapor box connected to a vacuum system. The vacuum permits the removal of similar boiling point materials at low temperatures. Similar products can be produced by either using the LTD system or bypassing the LTD system. When the LTD system is bypassed, the temperatures of the material going into the THVB must be at a higher temperature in order to separate similar boiling point materials. The bypassing of the LTD system, when operating at these high temperatures, is referred to as a "straight run."

The two types of coal tar refining systems used at the Plant do not generate waste materials of any type which require special management practices on a daily or routine basis. Residue in the batch stills is a listed hazardous waste (K148), and residue in the crude coal tar storage tanks is also a listed hazardous waste (K147). But both types of materials are exempt from regulation as hazardous wastes when maintained in the stills and tanks.

### 2. Response to Request Number 2

Materials occasionally received by the Plant in the past for use as raw materials include coal tar oil, water gas tar, crude oil tank bottoms and driveway sealer. In 1992, a quantity of





waste cooking oil which the Plant was not able to burn in its fluidized bed boiler was used as a raw material. Coal tar pitch is occasionally received by the Plant for direct addition to the Plant's final pitch products. Clean out materials from barges used by AlliedSignal to transport crude coal tar are used by the Plant as a raw material. In 1993 and 1994, the Plant received several shipments of non-hazardous waste water for management in its wastewater treatment system. Documents reflecting recent shipments of all of these materials are set forth in Attachment 2.

3. Response to Request Number 3

Materials referred to in response to Request Number 2 were determined to be non-hazardous either on the basis of process knowledge, analytical information, or both. Responsive documents are set forth in Attachment 2.

4. Response to Request Number 4

Waste materials generated by the Plant and transported off-site for further management over the past several years include the following:

a. Soil and rock contaminated by a spill of DH oil. These materials are the only hazardous wastes generated by the Plant over the past several years and transported off-site for further management. Documents reflecting a one-time shipment of this material to a hazardous waste landfill in 1992 are included in Attachment 4.

b. Crushed empty metallic drums once used to store products, raw materials and lubricating oils. Documents reflecting shipments of this material to a non-hazardous waste landfill for the years 1992, 1993 and 1994 are included in Attachment 4.

c. "Plant waste" consisting of office paper waste, cardboard boxes and other similar wastes. Documents reflecting shipments of this material to a non-hazardous waste landfill are too voluminous to attach to this response and, therefore, are available for inspection by the Agency at the Plant site.

d. Deteriorated polyurethane foam storage tank insulation. Documents reflecting a one-time shipment of this material to a non-hazardous waste landfill in 1992 are included in Attachment 4.

e. Asbestos insulation from process equipment and piping. Documents reflecting a one-time shipment of this material to a non-hazardous waste landfill in 1994 are included in Attachment 4.

f. Used motor oil collected from oil changes of company vehicles. Documents reflecting a one-time shipment of this material to Safety-Kleen in 1994 are included in Attachment 4.



g. Boiler ash generated by the burning of coal and various non-hazardous materials in the Plant's fluidized bed boiler (see response to Request Number 9). Documents reflecting shipments of this material to a non-hazardous waste landfill are too voluminous to attach to this response and are, therefore, available for the Agency's inspection at the Plant site.

5. Response to Request Number 5

All materials identified in Section 4.b -g, above, were determined to be non-hazardous on the basis of the Plant's process knowledge and on the verification of that determination by the off-site vendor handling the material. Documents reflecting the approval of off-site vendors are included in Attachment 4. An analysis of the material identified in Section 4. a, above, is included in Attachment 4.

6. Response to Request Number 6

For the past five years, approximately 60-80 million gallons of crude coal tar has been supplied to the Plant by the following facilities:

- a. National Steel Corp.  
Ecorse, MI
- b. Detroit Coke Corp.  
Detroit, MI
- c. Tonawanda Coke Corp.  
Tonawanda, NY
- d. Bethlehem Steel Corp.  
Lakawana, NY
- e. Koppers Industries  
Toledo, OH
- f. DoFasco, Inc.  
Hamilton, Ont.
- g. Algoma Steel  
Saulte St. Marie, Ont.
- h. U.S. Steel  
Gary, IN
- i. AK Steel  
Middletown, OH



- j. LTV Steel  
Warren, OH
- k. Stelco Inc.  
Nanticoke, Ont.
- l. Protexa  
Montcloya, Mexico
- m. Sloss Industries  
Birmingham, Al
- n. Reilly Industries  
Cleveland, OH
- o. Inland Steel  
East Chicago, IN

In their entirety, the documents reflecting shipments of crude coal tar from the facilities noted above for the past five years are too voluminous to attach to this response. Such documents, as well as any analytical information associated with the shipments, are available for the Agency's review at the Plant site. Certain other materials derived from coal are identified in Responses to Request Numbers 2 and 9.

7. Response to Request Number 7

"Baie Comeau Pitch" is a type of solid binder or anode pitch which was produced as one of the Plant's products from approximately 1960 to 1991 for the Canadian Reynolds Metals plant located in Baie Comeau, Quebec. This pitch was produced by the distillation of coal tar by the Tar Distillation unit. The liquid pitch was poured into flat metal bays, where it cooled and was removed by front-end loaders. The solid pitch was then stored for ship transportation to Baie Comeau in piles situated on top of an asphalt pad. The material was loaded onto ships by a belt conveyor fed by front-end loaders.

The piles of Baie Comeau Pitch are no longer present at the Plant. The last shipment to Baie Comeau occurred on or about October 11, 1991. Thereafter, all of the Pitch remaining in the piles was shipped to AlliedSignal's Ironton, Ohio plant. The last shipment to Ironton occurred on or about December 8, 1992. (The Plant does not have the ability to liquefy solid pitch. The Ironton plant has a pitch melting operation. The pitch was melted in the Ironton pitch melter and then shipped as product to Ironton's customers.)





8. Response to Request Number 8

As discussed in the documents set forth in Attachment 8, the piles referred to in this Request contained coal, coke and crude coal tar materials originating from a barge clean out in 1983. In 1991, the Plant determined that the piles did not exhibit any of the characteristics of a hazardous waste, and, in a letter dated September 16, 1991, the Region and Michigan DNR concurred in this determination. Subsequent to that determination, the Plant burned the material contained in the pile in its fluidized bed boiler until early 1993, when the contents of the pile were completely consumed.

9. Response to Request Number 9

Until March of 1994, the Plant operated a fluidized bed boiler which used coal as a primary fuel and Number 2 fuel oil as a secondary fuel. Coal burning was occasionally supplemented with materials such as clean-out materials from barges used to transport crude coal tar (see Response to Request Number 8), driveway sealer, solid tar, coal tar pitch, and gel fibers. None of these materials were listed or characteristic hazardous wastes.

The Plant reported for the purposes of EPCRA § 313 that approximately one pound of benzene was burned in the Plant's fluidized bed boiler. As discussed in the documents set forth in Attachment 8, the pile referred to in those documents contained trace amounts of benzene. Using benzene concentration information obtained for the pile, the Plant determined that the total amount of pile material burned in the boiler contained approximately one pound of benzene.

10. Response to Request Number 10

Inasmuch as the regulation of PCBs is outside of the ambit of RCRA, the statutory authority relied upon by the Agency in its request, no response to this request is required. In the spirit of cooperation, however, AlliedSignal notes that the last piece of equipment at the Plant which contained PCBs was removed and properly managed off-site in 1990. The Plant has no information to suggest that activities involving the disposal of PCBs took place at the Plant prior to or after 1990.

11. Response to Request Number 11

There are no underground storage tanks present at the Plant.

12. Response to Request Number 12

As explained in the attached cover letter, this request does not apply to a non-RCRA permitted facility such as the Plant.



2/2/95

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:

Allied-Signal Inc.  
1200 Zug Island Road  
Detroit, Michigan 48209

Attention: Daryl C. Quinn, Plant Manager

REQUEST FOR INFORMATION PURSUANT TO THE CLEAN AIR ACT

The United States Environmental Protection Agency (U.S. EPA), by David Kee, Director of the Air and Radiation Division, Region 5, hereby requires Allied-Signal to submit certain information pursuant to the Clean Air Act (Act), 42 U.S.C. § 7401 et seq., as amended by the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399. The Administrator of the U.S. EPA is authorized to require submittal of such information by Section 114(a) of the Act, 42 U.S.C. § 7414(a), as amended by Sections 302 and 702 of the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399, 2574, and 2680 (to be codified at 42 U.S.C. § 7414(a)) (hereinafter referred to as Section 114(a)). Authority to require submittal of information pursuant to Section 114(a) has been delegated to the Director of the Air and Radiation Division. The information to be submitted in response to this request is specified in Appendix A.

Allied-Signal is the owner and/or operator of an emission source as specified in Section 114(a) of the Act. The information sought by this request is necessary for U.S. EPA to determine whether Allied-Signal is in compliance with the applicable provisions of the Michigan State Implementation Plan, as approved by the Administrator of U.S. EPA pursuant to Section 110 of

the Act, 42 U.S.C. § 7410, as amended by Section 101 of the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399, 2404.

The information specified in Appendix A must be submitted within 20 calendar days of receipt of this request. All information submitted in response to this request must be certified as true, correct, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Allied-Signal. All required information should be sent to Marietta Newell, Air Toxics and Radiation Branch (AT-18J), Air and Radiation Division, United States Environmental Protection Agency, 77 West Jackson Boulevard, Chicago, Illinois 60604. Copies of the required information should also be sent to Rajendra Sinha, Director, Wayne County Air Quality Division, Wayne County Health Department, 640 Temple Street, Suite 700, Detroit, Michigan 48201. Failure to fully comply with the terms of this request for information may subject Allied-Signal to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413, as amended by Section 701 of the Clean Air Act Amendments of 1990, Pub. L. No. 101-549, 104 Stat. 2399, 2672, et seq. (to be codified at 42 U.S.C. § 7413) (hereinafter referred to as Section 113).

Pursuant to 40 C.F.R. Part 2, Subpart B, 41 Fed. Reg. 36902 (September 1, 1976) as amended by 43 Fed. Reg. 40000 (September 8, 1978) and 50 Fed. Reg. 51661 (December 18, 1985), Allied-Signal is entitled to assert a claim of business confidentiality regarding any portion of the information submitted in response to this request, except emission data, as defined at 40 C.F.R. § 2.301(a)(2). Failure to assert a claim of business confidentiality renders all submitted information available to the public without further

notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. Part 2, Subpart B. This request is not subject to the Paperwork Reduction Act because it seeks collection of information in an administrative action or investigation involving U.S. EPA and specific individuals or entities.

Any information submitted in response to this request may be used by U.S. EPA in support of an administrative, civil, or criminal action against Allied-Signal. Knowing submittal of false information to U.S. EPA, in response to this request, may be actionable under Section 113(c)(2) of the Act, as well as 18 U.S.C. § 1001, and 18 U.S.C. § 1341.

Any questions concerning this request for information should be directed to Jeffrey Gahris, of my staff, at (312) 886-6794.

Date

2/1/95

  
David Kee, Director  
Air and Radiation Division

cc: Jerry Avery  
Michigan Department of Natural Resources

## APPENDIX A

The following information must be supplied in accordance with the foregoing Request for Information Pursuant to the Clean Air Act:

For Allied-Signal's coke oven tar processing plant (Detroit Tar Plant) located at 1200 Zug Island Road, Detroit, Michigan, please provide the following:

1. Identification and a description of each process unit (including storage tanks and the substances stored in them), date that original construction commenced, and date of initial start up. Provide plant layout and flow diagrams sufficient to illustrate the process.
2. Normal and maximum hours of operation per year, for each process unit. Indicate whether it is operated in a batch or continuous mode. Indicate whether any units are currently not in operation. If not operating, indicate shutdown date and date of re-start, if anticipated.
3. Maximum design and normal actual hourly throughput capacity for each process unit. For storage tanks, indicate design storage capacity.
4. Type of air pollutants generated by each process unit identified above, including constituents known to cause odors and/or opacity.
5. Description of emission control devices associated with each process unit, if any, including the manufacturer's name, the pollutant(s) that each device is designed to control, and the associated design specification for control efficiency.
6. Known or estimated capture and control efficiencies of each emission control device (state how they were determined and submit the most recent stack tests and calculations used to make such determinations for the process unit in question). Document the operating rates, control device parameters, and type of materials used during the tests. Indicate reference test method used.
7. Identification of process unit parameters monitored and recorded for the unit. Indicate frequency of observations for each parameter monitored, the nature of variation in the parameters under normal operating conditions, and their range in values over the last three months.
8. Description of operating practices that are used to minimize emissions from the process units. Identify process and emission control device operating parameters that are routinely monitored, and their range in values over the last three months.
9. Copies of current air emission operating permits, and construction permits issued to the Detroit Tar Plant by state or local air pollution control authorities for new process units or process unit modifications. If any process units are operating without such permits, provide an explanation for each such unit.



10. Indication of the sources of the coke oven tars or other materials processed at the Detroit Tar Plant. Provide any documents pertaining to the testing of the tars or other materials, which are currently being processed, for hazardous or toxic constituents.
11. Diagrams of smoke stacks, showing ductwork, breeching, and flue arrangements, including bypass equipment. Also, submit diagrams that locate process vents or pressure relief valves that may cause emissions.
12. Description of sources of fugitive emissions of gaseous pollutants, including sources such as pumps, valves, storage tanks, and flanges. Indicate what specific compounds (including benzene) which are known to be emitted as fugitives, and the nature of Allied-Signal's program to minimize such emissions. Provide any available estimates of the magnitude of such emissions.
13. Identification of fuels used in boilers or other combustion equipment, and the sources of those fuels.
14. Description of measures taken to minimize the presence of objectionable odors from plant processes. Describe the frequency and nature of complaints received from the public during the last 6 months.
15. Copy of the malfunction and abatement plan for the Detroit Tar Plant. Indicate the nature, frequency, and duration of any malfunctions that occurred within the last year, including control equipment bypasses, and measures taken to correct them.
16. Description of measures used to control fugitive dust emissions from paved and unpaved roadways and parking lots, or other sources. Identify products used as dust suppressants.

CERTIFICATE OF SERVICE

I, Beverly Short, do hereby certify that a Request For Information Pursuant to the Clean Air Act was sent by Certified Mail, Return Receipt Requested, to:

Daryl C. Quinn, Plant Manager  
Allied-Signal Inc.  
1200 Zug Island Road  
Detroit, Michigan 48209

Certified Mail Number: P 188 577 196

I certify that copies of the Request for Information pursuant to the Clean Air Act were sent by first class mail to:

Rajendra Sinha, Director  
Wayne County Air Pollution Control Division  
Wayne County Health Department  
640 Temple Street, Suite 700  
Detroit, Michigan 48201

Barbara J. Rosenbaum, Chief  
Air Quality Division  
Michigan Department of Natural Resources  
Town Center  
Suite B, #200  
333 South Capitol  
Lansing, Michigan 48933

February 2, 1995  
Date

Adrian M. Phillips for  
Beverly Short, Secretary  
Enforcement Section  
Air Toxics and Radiation Branch





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 02 1995

HRE-8J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Daryl Quinn  
Plant Manager  
Allied Signal, Incorporated  
Detroit Tar Plant  
1200 Zug Road  
Detroit, Michigan 48209

Re: RCRA §3007 Information Request  
Allied Signal, Detroit Tar Plant  
Detroit, Michigan  
MID 005 516 198

Dear Sir/Madam:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The information requested relates to Allied Signal's facility in Detroit, Michigan.

The information requested herein must be provided to this office within the timeframe specified in the request, notwithstanding its possible characterization as confidential information. You may, pursuant to 40 CFR §2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR §2.203(b). Information covered by such a claim will be disclosed by U.S. EPA only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

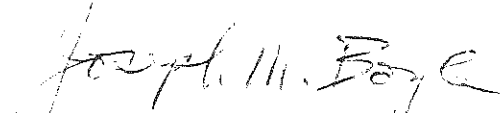
Written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying, pursuant to 40 CFR §270.11, that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. Any documents submitted to the U.S. EPA, Region 5, pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge or belief.



Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.

If you have any questions regarding this matter, please contact Mr. Michael Cunningham, RCRA Enforcement Branch, at (312) 886-4464. Your response should be sent to the United States Environmental Protection Agency, Region 5, RCRA Enforcement Branch (HRE-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Michael Cunningham.

Sincerely yours,



Joseph M. Boyle, Chief  
RCRA Enforcement Branch

Enclosure

cc: Tim Sonnenberg, MDNR

OFFICIAL FILE COPY





bcc: Padmavati Klejwa, CM-29A

OFFICIAL FILE COPY			
CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
<i>[Signature]</i> 1-22-95	<i>[Signature]</i> 1-23-95	<i>[Signature]</i> 1-25-95	<i>[Signature]</i> 1-31-95

*ap* 1-30-95



1/31/95

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

ALLIED SIGNAL, INCORPORATED	)	INFORMATION REQUEST PURSUANT
DETROIT TAR PLANT	)	TO SECTION 3007 OF THE
1200 ZUG ISLAND ROAD	)	RESOURCE CONSERVATION AND
DETROIT, MICHIGAN 48209	)	RECOVERY ACT, AS AMENDED,
	)	42 U.S.C. §6927
EPA ID NO.: MID 005 516 198	)	

This is a request by the United States Environmental Protection Agency (U.S. EPA) issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The issuance of this request serves to require Allied Signal, Incorporated to submit information relating to the generation, storage, treatment, disposal, and/or recycling of solid and/or hazardous waste at the Allied Signal, Detroit Tar Plant located in Detroit, Michigan, as defined by Michigan Administrative Code, Part 1 and 40 CFR Part 261.

The State of Michigan is authorized to administer and enforce a hazardous waste management program in lieu of the Federal program under Subtitle C of RCRA, 42 U.S.C. §6921 et. seq., subject to the Hazardous and Solid Waste Amendments of 1984 (HSWA), November 8, 1984, 42 U.S.C. §6926(c) and (g). The State's program, as administered by the Michigan Department of Natural Resources, was approved by U.S. EPA pursuant to 42 U.S.C. §6926(b) and 40 CFR Part 271. U.S. EPA's approvals were effective on October 30, 1986, January 23, 1990, and June 24, 1991 (see 51 Fed. Reg. 36804, 54 Fed. Reg. 46808, and 56 Fed. Reg. 18517). Michigan is authorized to implement only the HSWA requirements identified in



the June 24, 1991, Federal Register notice granting Michigan authorization (see 56 Fed. Reg. 18517). Michigan has primary responsibility for enforcing its hazardous waste program.

However, U.S. EPA retains the authority to exercise its enforcement authorities under Sections 3007, 3008, 3013, and 7003 of RCRA, 42 U.S.C. §§6927, 6928, 6934, and 6973, as well as under other Federal laws and regulations.

#### I. INSTRUCTIONS

This request for information pertains to any and all information you may have regarding the generation, treatment, storage, disposal and/or recycling of solid and/or hazardous waste at the Allied Signal, Detroit Tar Plant located at 1200 Zug Island Road, Detroit, Michigan 48209 ("Allied").

If any information called for herein is not available or accessible in the full detail requested, the request shall be deemed to call for the best information available. The request also requires the production of all information called for in as detailed a manner as possible based upon such information as is available or accessible.

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets.

You are entitled to assert a claim of confidentiality pursuant to 40 CFR §2.203(b) for any information produced that, if disclosed



to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2. A request for confidential treatment must be made when information is provided since any information not so identified will not be accorded this protection by the Agency.

The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true, accurate, and complete to the best of the signatory's knowledge and belief. Should the signatory find at any time after submittal of the requested information that any portion of this submittal certified as true is false or misleading, the signatory should so notify U.S. EPA. If any information submitted under this information request is found by U.S. EPA to be untrue or misleading, the signatory can be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action.





The information requested herein must be provided, within twenty (20) days following receipt of this request, to the United States Environmental Protection Agency, Region 5, Attention: Mr. Michael Cunningham, RCRA Enforcement Branch (HRE-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

This Information Request is not subject to the Paperwork Reduction Act, See 44 U.S.C. Sections 3518(c)(1)(A) and (B).

## II. DEFINITIONS

- A. "Disposal" means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters, as defined in Mich. Admin. Code r. 299.9102 and 40 CFR §260.10.
- B. "Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them), as defined in Mich. Admin. Code r. 299.9103 and 40 CFR §260.10.



- C. "Generator" means any person, by site, whose act or process produces hazardous waste identified or listed in 40 CFR §§261.10 through 261.33 or whose act first causes a hazardous waste to become subject to regulation, as defined in Mich. Admin. Code r. 299.9104 and 40 CFR §260.10.
- D. "Hazardous waste" means a hazardous waste as defined in Mich. Admin. Code r. 299.9104 and r. 299.9203 and 40 CFR §§261.3 and 260.10.
- E. "Management" means the systematic control of the collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of hazardous waste, as defined in Mich. Admin. Code r. 299.9105 and 40 CFR §260.10.
- F. "Recycle" means use, reuse, or reclamation as defined in Mich. Admin. Code r. 299.9107. Material is "used" or "reused" if it is either of the following:
- i) Employed as an ingredient in an industrial process to make a product, unless distinct components of the material are recovered as separate end products, such as when metals are recovered from metal-containing secondary materials.
  - ii) Employed in a particular function or application as an effective substitute for a commercial product, such as spent pickle liquor used as phosphorus precipitant and sludge conditioner in wastewater treatment.



- G. "Solid Waste" means any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from the industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved material in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges which are point sources subject to permits under Section 402 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §1342, or source, special nuclear, or byproduct material as defined by the Atomic Energy Act of 1954, as amended, 42 U.S.C. §2011 et. seq., as defined in Section 1004 of the Solid Waste Disposal Act, as amended.
- H. "Storage" means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere, as defined in Mich. Admin. Code r. 299.9107 and 40 CFR §260.10.
- I. "Treatment" means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character, or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as



to render such waste nonhazardous or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume, as defined in Mich. Admin. Code r. 299.9108 and 40 CFR §260.10.

- J. "You" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assignees, and agents.
- K. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in RCRA, Mich. Admin. Code r. Parts 1 through 11, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

III. Request for Answers to Questions and the Production of Documents

1. Provide a detailed description of each manufacturing process carried out at Allied since November 19, 1980. Include the process for the manufacture of creosote and any processes producing dibenzofurans. Identify the raw materials used, the steps in the manufacturing process, the final products, and all solid and/or hazardous wastes generated from the processes.





2. Provide a description of all solid and/or hazardous waste received by Allied since November 19, 1980. Describe any treatment, storage and/or disposal activities conducted on this waste as well as any recycling, reuse, or reclamation which took place. Describe the ultimate destination of each waste. If the material is/was shipped off-site, include manifests, bills of lading, trip logs, etc.
3. For all wastes identified in the answer to question number two (2) above, describe how Allied determined if the solid waste was or was not a hazardous waste pursuant to specific procedures identified at 40 CFR §262.11. Include copies of any analyses used in making such a determination.
4. Provide a description of all solid and hazardous waste generated at Allied since November 19, 1980. Describe the process(es) which generate or generated each waste stream. Describe any treatment, storage, and/or disposal activities carried out on each waste, as well as the ultimate destination of each waste. If the material is/was shipped off-site, include manifests, bills of lading, trip logs, etc.
5. For all wastes identified in the answer to question number four (4) above, describe how Allied determined if the solid waste was or was not a hazardous waste pursuant to specific



procedures identified at 40 CFR §262.11. Include copies of any analyses used in making such a determination.

6. Identify all facilities that sent Allied any material derived from coal during the past five (5) years which was used in your manufacturing processes. Provide the name, address, the process from which the material was generated, and shipping documents describing the material being sent (including manifests, bills of lading, trip logs, etc.). Also, provide the results of all analyses conducted by and/or provided to Allied on such coal material over the last five (5) years.
7. Describe the process which generated the Baie Comeau Pitch which was being stored in piles at Allied on July 30, 1992. Provide a detailed description of all materials used in its manufacture, including their origin. Also, provide the date on which the pile was first created. If the pile is no longer present at Allied, explain the method of its disposal.
8. Identify the origin of all materials stored in piles at Allied on July 30, 1992, which contained material generated from the cleaning of barges and is/was being burned in the fluid bed boiler. Include a description of the processes which generated these materials prior to their placement in the barges, and the results of any analyses done on them.



Also, provide the results of all analyses of the pile(s), and the date on which materials were first placed on the pile(s).

9. Identify all materials, including all solid and/or hazardous wastes, that are burned for energy recovery. Describe how Allied determined that one (1) pound of benzene was burned on-site for energy recovery in calendar year 1993.
10. Describe any activities involving the disposal of polychlorinated biphenyls (PCBs) which have or will take place at Allied, including disposal in a landfill not licensed pursuant to the Toxic Substance Control Act, 50 U.S.C. §2601 et. seq. Include the quantities (by weight) of PCBs.
11. Provide a description of all underground storage tanks at Allied, including the location, current contents, storage capacity, and date when any material was first stored in each tank.
12. Provide the following notarized certification by a responsible corporate officer or by a duly authorized representative of that person:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who



manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Issued this 5/27 day of January, 1995.

Joseph M. Boyle  
Joseph M. Boyle, Chief  
RCRA Enforcement Branch  
Waste Management Division  
United States Environmental Protection Agency  
Region 5

OFFICIAL FILE COPY





INFORMATION REQUEST  
RCRA ENFORCEMENT BRANCH APPROVAL  
(Delegation 8-8)

AUTHORITY: ☒ RCRA §3007 only ☐ RCRA §3007 and CERCLA §104

INSTALLATION NAME: Allied Signal, Inc.

LOCATION ADDRESS: 1200 Zug Island Road

CITY: Detroit

STATE: MI ZIP: 48209

REGISTERED AGENT: \_\_\_\_\_

IS THE MATTER IN RCRA LITIGATION OR UNDER A COURT ORDER?

☒ NO

☐ YES (Concurrence by Regional Counsel is required).

**A. DRAFT**

INITIALS

DATE

1. REB Staff Name Michael Cunningham  
SECTION: ☐ IL/IN ☐ MI/WI ☐ OH/MN ☒ IL/MI/WI ☐ IN/OH/MN

MC

1-23-95

2. REB Section Chief

TES#2

1/26/95

3. ORC Attorney Name Padmavati Klejwa  
(Only if the matter is in RCRA Litigation  
or under court order)

PK

1-25-95

**B. FINAL**

1. REB Staff

MC

1/26/95

2. REB Section Chief

LL

1/26/95

3. ORC Attorney (For Litigation  
Consultation only)

\_\_\_\_\_

\_\_\_\_\_

4. REB Chief

JMB

1/31/95

5. Assoc. Director, Office of RCRA  
(only if CERCLA §104 authority is  
referenced)

\_\_\_\_\_

\_\_\_\_\_

6. WMD Director (only if CERCLA §104  
authority is referenced)

\_\_\_\_\_

\_\_\_\_\_

**INFORMATION REQUEST**  
**RCRA ENFORCEMENT BRANCH APP**  
 (Delegation 8-8)

AUTHORITY: ☒ RCRA §3007 only ☐ RCRA §3007 only

INSTALLATION NAME: Allied Signal, Inc.

LOCATION ADDRESS: 1200 Zug Island Road

CITY: Detroit

STATE: MI ZIP: 48209

REGISTERED AGENT: \_\_\_\_\_

IS THE MATTER IN RCRA LITIGATION OR UNDER A COURT ORDER?

☒ NO

☐ YES (Concurrence by Regional Counsel is required)

P 243 556 844  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

* U.S.G.P.O. 1985-480-794 PS Form 3800, June 1985 HRE-8J	Sent to	Daryl Quinn
	Street and No.	1200 Zug Road
	P.O., State and ZIP Code	Detroit, Michigan 48209
	Postage	\$ 78
	Certified Fee	110
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt showing to whom and Date Delivered	110
	Return Receipt showing to whom Date, and Address of Delivery	
	TOTAL Postage and Fees	\$ 298
Postmark or Date		

**A. DRAFT**

	INITIALS	DATE
1. REB Staff Name <u>Michael Cunningham</u> SECTION: <input type="checkbox"/> IL/IN <input type="checkbox"/> MI/WI <input type="checkbox"/> OH/MN <input checked="" type="checkbox"/> IL/MI/WI <input type="checkbox"/> IN/OH/MN	<u>MC</u>	<u>1-23-95</u>
2. REB Section Chief	<u>LLF</u>	<u>1/26/95</u>
3. ORC Attorney Name <u>Padmavati Klejwa</u> (Only if the matter is in RCRA Litigation or under court order)	<u>PK</u>	<u>1-25-95</u>

**B. FINAL**

1. REB Staff	<u>MC</u>	<u>1/26/95</u>
2. REB Section Chief	<u>LLF</u>	<u>1/26/95</u>
3. ORC Attorney (For Litigation Consultation only)	<u>PK</u>	<u>1/26/95</u>
4. REB Chief	<u>JMB</u>	<u>1/31/95</u>
5. Assoc. Director, Office of RCRA (only if CERCLA §104 authority is referenced)	_____	_____
6. WMD Director (only if CERCLA §104 authority is referenced)	_____	_____





RECEIVED

AUG 3 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

ENSR Consulting  
and Engineering  
35 Nagog Park  
Acton, Massachusetts 01720  
(508) 635-9500  
(508) 635-9180 (FAX)

July 29, 1992

ENSR Ref. No: 0805-006  
ENSR Doc. No: SJP0789

Ms. Gertrude Matuschkovitz  
U.S. EPA Region 5  
77 West Jackson Street  
Chicago, IL 60604

Re: Notification in Accordance With The Off-site Policy, Lot 19 Grove Street Site,  
Brockton, MA

Dear Ms. Matuschkovitz:

This letter is to confirm your voice-mail message of July 24, 1992. Your message stated that an EPA inspection will be performed at the Allied Signal facility in Detroit, Michigan and will be completed by the end of July. The purpose of this inspection is to evaluate the compliance status of the Allied facility. Based on the results of this evaluation, EPA will inform ENSR whether or not the Allied Facility in Detroit is considered acceptable to receive CERCLA wastes in accordance with EPA's Off-Site Policy and in adherence to Section 121(d)(3) of SARA.

As discussed during our telephone conversation of July 22, 1992, the Allied facility does not appear on EPA's list of treatment, storage, and disposal facilities (TSD) because the Detroit Allied facility receives hazardous waste for recycling only, and is therefore exempt from the RCRA requirement for TSD facilities. However we understand that, in accordance with the EPA Off-Site Policy, and in order to receive CERCLA waste, an inspection of the facility by EPA must be performed within the last six months prior to receipt of the CERCLA waste. Completion of the above referenced inspection will therefore satisfy the requirements of the Off-site Policy.

A removal action is being performed at the above referenced site located in Brockton, Massachusetts. Removal action activities include removal and disposal of coal tar material. Removal and disposal of the coal tar material is scheduled to occur between August 3 and September 30, 1992. The Allied facility in Detroit, Michigan has been selected as the disposal facility for this project if recycling of the coal tar is selected as the disposal option.





Ms. Gertrude Matuschkovitz  
July 29, 1992  
Page 2

ENSR appreciates your attentiveness to this situation and the expediency with which you have scheduled the facility inspection. If you have any questions or require additional information please do not hesitate to call me at (508) 635-9500.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Perry", is written over a horizontal line.

Scott J. Perry  
Geologist

cc: Arthur Wing/EPA OSC  
Paul LaShoto/Bay State Gas  
William Duvel/ENSR



MEMORANDUM ■ ■ WAYNE COUNTY HEALTH DEPARTMENT  
Air Pollution Control Division

TO: File

FROM: J. E. DaRocha, Air Pollution Inspector

DATE: September 25, 1991

SUBJECT: Annual Compliance Inspection at Allied Signal  
Detroit Tar Plant, 1200 Zug Island Road,  
Detroit, Michigan 48209

Inspection dates: September 5, 1991  
September 12, 1991

INTRODUCTION

While at the plant, I was accompanied by Messrs. Daryl Quincy, Plant Manager, Greg Migaki, Superintendent of Operations and Rudolf Dawson, Supervisor of Environmental Engineering.

This facility processes coke oven crude coal tars into pitch, roofing tars, and other usable by-products. The process involves heating the tars in a tar heater to the boiling point which enables the various components to be separated by cooling and condensation.

PROCESS DESCRIPTION

The crude coal tars are continually distilled in a two-system flash-distillation process. The first system, dehydration (DH), is used to remove entrained water in crude tar as the crude tar is pumped from storage to the distillation column through a series of heat exchangers. At the distillation column (dehydration) the tar is heated and passed through a flash chamber where it is separated into DH oil, DH water and dry tar. The dry tar is then passed into flashing chambers where oils are separated from the liquid pitch product. These oils are then further separated into carbolic oil, light creosote oil, heavy creosote and pitch. The pitch, which is 99% carbon, is cooled to below 450° F. in a recirculating water tube cooler. After cooling to below 450° F., the pitch is pumped to open air pitch bays where it can cool further, solidify and harden.





Annual Compliance Inspection at Allied Signal  
Detroit Tar Plant, 1200 Zug Island Road  
Detroit, Michigan 48209  
Page 2

The pitch, when hard, is removed from the pitch bay by manual and mechanical means using a small front end loader.

The various molecular weight/volatility tars are stored in storage tanks. When the tars are being pumped to and from the storage, a Venturi Wet Scrubber is used to clean the purge air and condense vapors prior to venting the tanks.

#### EQUIPMENT AND CONTROL SYSTEMS

- \* Creosote oil fired steam boiler with wet scrubber
- \* Tar heater furnace fired with creosote oil with wet scrubber
- \* Coal tar pitch fuel collector system from tank cars and trucks using wet venturi and scrubber gas-water separator
- \* VOC control system in pitch bay storage system
- \* Pitch bay 14, 15, 16, 16, 17, 19 and 20
- \* Barrel loading dock
- \* Tar still (not in service)
- \* Tar still (in service)
- \* Installation of resource recovery fluidized boiler fueled by using excess product with cyclone and baghouse controls
- \* Fugitive Dust Program negotiated WCAPCD and implemented through State Rule 373. The program consists of watering storage piles and sweeping paved roads weekly. (A copy of the route map is attached).

#### DISCUSSION

Due to a concern over the accuracy of existing Certificates of Operation (C of O), a thorough, indepth study ensued. Every C of O was incorrect to some degree. All C of O's were rewritten with the correct information added as necessary. Appendix A lists the corrected C of O's:

The company received an extension to the original trial operating period for the fluidized bed boiler on March 1, 1989. The approval allowed the trial operation to be extended through May 29, 1989. The fluidized bed boiler stack test was performed on April 19 and 20, 1989. A copy of the Letter of Extension and correspondence regarding the stack test results are included in Appendix D of this report. The stack showed that the fluidized bed boiler is not in compliance with sulfur dioxide emissions, per permit conditions. The company is pursuing several options by which it can reduce the sulfur dioxide emissions being emitted by the boiler. The facility is required to comply with the following Wayne County Ordinance Regulations:



Annual Compliance Inspection at Allied Signal  
Detroit Tar Plant, 1200 Zug Island Road  
Detroit, Michigan 48209  
Page 3

County Ordinance: Sec. 501 A Inc., State Rule 301  
Visible Emissions, 20% Opacity Limitation

Sec. 601, Emission Limitations and  
Prohibitions Sulfur Bearing Compounds  
(Table 6-1)

Sec. 801 A Inc., State Rule 901 B  
Air Contaminants - Health Nuisance

Copies of three Installation Permit Applications are attached.

- |                                  |        |
|----------------------------------|--------|
| 1. Mixer/Briquetter              | C-7602 |
| 2. Hammermill Crusher            | C-7626 |
| 3. Wastewater Treatment Facility | C-8906 |

Only one Notice of Violation (NOV) was issued in 1991, which related to excess opacity of the fluidized bed boiler. A copy is attached.

#### CONCLUSION

All storage tanks were in good condition with the accompanying vapor condensers operational. The York Shipley Boiler was shut down and on standby while the fluidized bed boiler was in service.

The facility has been operated in compliance except for the above exclusion. The company will be submitting a program for sulfur dioxide emission reduction.

J. E. DaRocha/bb

attachments

cc: R. Zabick - Enforcement Supervisor  
M. Maillard - Enforcement Director  
I. Konanahalli - Engineer

a:allsig.jd



APPENDIX A

	<u>APC NO.</u>
Tar heater and burner	5-10577
Tar stills and burner # 1, 3 and 4	5-10578
No. 2 Tar still - #629	5-10579
Oil storage tanks #70 and 717	5-10580
Creosote oil tank #1220	5-10581
Creosote oil tanks #719, 720, 721, 722 and 723	5-10582
Tar tank #52	5-10583
Tar tanks #53 and 54	5-10584
Coal tar pitch tank #75	5-10585
Creosote oil tank #718	5-10586
Coke oven tar or creosote oil tank #66	5-10587
Tarvia Coolers #1, 2, 3, 4, and 5	5-10588
Creosote oil tank #65	5-10589
Coal tar pitch tank #57	5-10590
Creosote oil or oil pitch tanks #834 and 835	5-10591
Coke oven tar tank #51	5-10592
Water gas tar tank #68	5-10593
Special oil tank #715	5-10594
"E" Receiver creosote oil tank	5-10595
Coal tar oil tanks #73-A and 81	5-10597
Creosote oil tank #77	5-10598
"R" Receiver Dehydrated Oil	5-10599
Hard Pitch Bay #17	5-10600
Hard Pitch Bay #19	5-10601
Soft Pitch Barrel Loading	5-10602
Hard Pitch Barreling Dock	5-10603
Hard Pitch Bay #16	5-10604
Pitch Bay #20	5-10605
Coal Tar Pitch Blow Tanks #1, 2 and 3	5-10606
Coal Tar Pitch Tank #78	5-10607
Hard Pitch Bay #15	5-10608
Hard Pitch Bay #14	5-10609
Coke oven Tar Tank #544	5-10610
Caustic Soda Tank #71	5-10611
Coke Oven Tar Tank-#56	5-10612
Creosote Oil Tank #58	5-10613
Coal Tar Pitch Tank #50	5-10614
Coal Tar Pitch Tank #59/Coke Oven Tar Tank #60	5-10615
Contaminated Water Treatment Tank #ST-1 and ST-2	5-10616
Light Carbolic Oil Residue Treatment Tank #ST-3	5-10617
Caustic Tank #ST-4	5-10618
Coal Tar Tank #83	5-10619
Hi Flash Receivers #3 and 4	5-10620
Creosote Blend Tank #63/#2 Fuel Oil Tank #64	5-10621
Soft Pitch Tank #73	5-10622
Refined Tar Tank #74	5-10623
Tar Heater Vent	5-10624
(3) Tar Heater Relief Valves	5-10625



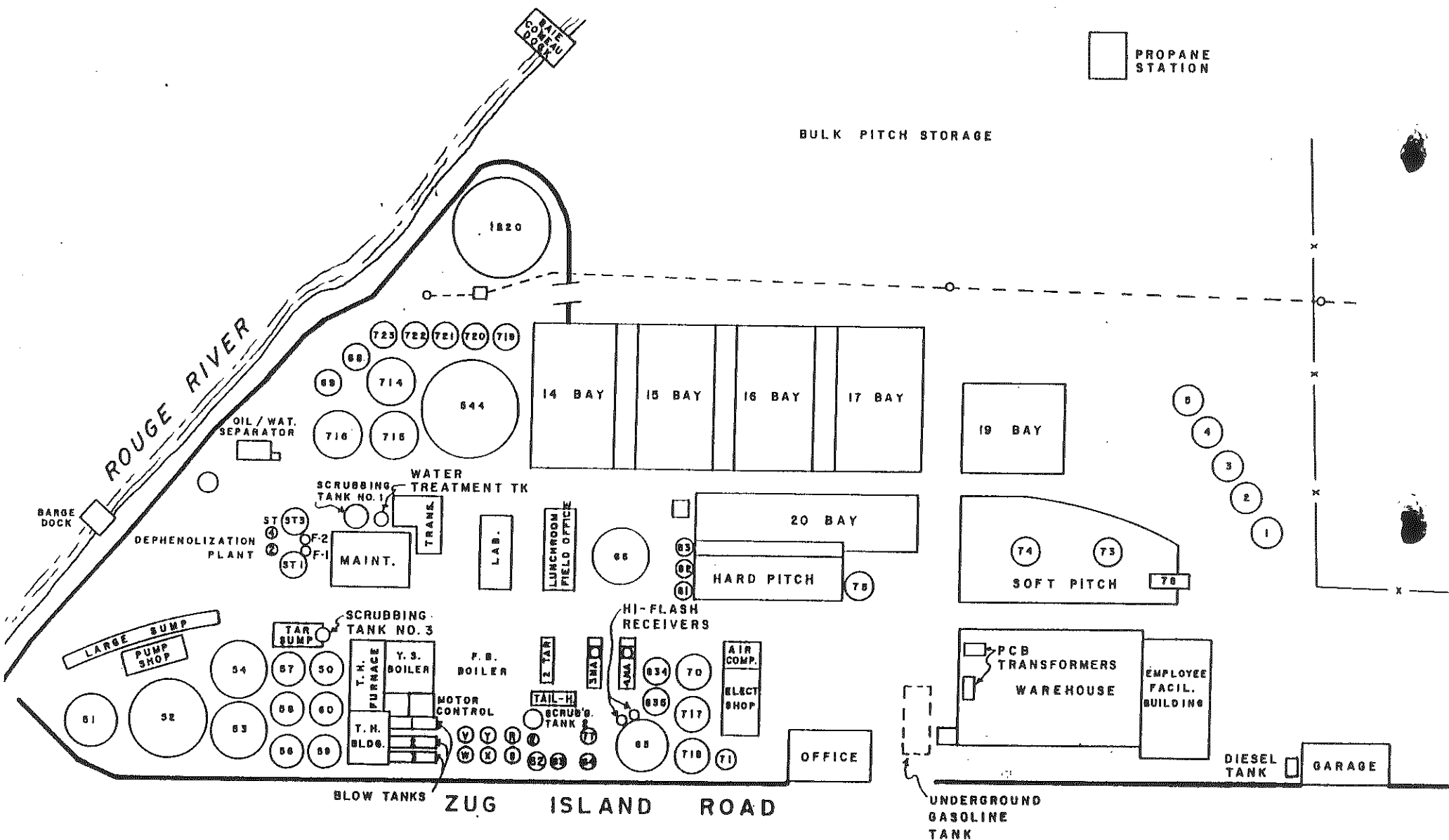
Oil Pitch Emergency Relief Valve #2	5-10628
(13) Coal Tar Loading Facilities	5-10629
(2) Pitch Loading Facilities	5-10630
(6) Coal Tar Pitch Loading Facilities	5-10631
(5) Coal Tar Oil Loading Facilities	5-10632
(3) Coal Tar Loading Facilities	5-10633
York-Shipley Boiler	5-10634
Mechanical Vacuum System	5-10635
Coal Tar Pitch Tank #59	5-21299
Carbolic Oil Tank #62	5-21300
Coke Oven Tar Tank #60	5-21301
Filtrate Oil Tank #69	5-23708
Coke Oven Tar or Creosote Oil Tanks #751 and 716	5-23709
"S" Receiver	5-23710
"V", "W", "X", and "Y" Receivers	5-23711

cc: M. Maillard  
R. Zabick  
I. Konanahalli





# ALLIED CHEMICAL SECTOR DETROIT TAR PRODUCTS









LOCATION ADDRESS	STREET	COMPLAINT NUMBER	10942	AREA AND GRID
1200 Zug Island				26-2455
Allied Signal			Detroit	
COMPANY AND/OR OCCUPANCY	DATE	TIME	COMMUNITY	ZIP
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE	3-2-94	A.M.-Valet	LS	DA ROCHA



The wind is blowing N/W and the air is really bad. Smells of benzene. Going on from 6:30 to approximately 7:00 A.M.??

1 NOTICE ACTIVE	3 FURTHER SURVEIL.	5 CORRECTIVE MEAS.	7 REFER OTHER BUREAU	9 NO JURISDICTION
2 NOTICE ISSUED	4 NO CAUSE	6 COND. CORRECTED	8 INCORRECT ADDRESS	INSPECTION REPORT
PREVIOUS COMPLAINTS	CAR NUMBER AND TIME	INSPECTOR'S SIGNATURE	PHONE	DATE
COMPLAINANT			842-4282	3-7-94
Curtis Thompson				
8096 Logan				
ADDRESS	STREET	COMMUNITY	ZIP	
WCHD-APC 9-07.0 COMPLAINT RECORD		WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION		

LOCATION ADDRESS	STREET	COMPLAINT NUMBER	10946	AREA AND GRID
1200 Zug Island				26-2455
Allied Signal			Detroit	
COMPANY AND/OR OCCUPANCY	DATE	TIME	COMMUNITY	ZIP
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE	3-7-94	4:20 P.M.	JN	DA ROCHA



The company was dumping odorous materials (toxin). Wind was blowing N → NE between 6:45 P.M. → 8:00, 3-6-94. The material is coming out of the stack. It smelled bad.

1 NOTICE ACTIVE	3 FURTHER SURVEIL.	5 CORRECTIVE MEAS.	7 REFER OTHER BUREAU	9 NO JURISDICTION
2 NOTICE ISSUED	4 NO CAUSE	6 COND. CORRECTED	8 INCORRECT ADDRESS	INSPECTION REPORT
PREVIOUS COMPLAINTS	CAR NUMBER AND TIME	INSPECTOR'S SIGNATURE	PHONE	DATE
COMPLAINANT			842-4282	3-8-94
Curtis Thompson				
8096 Logan				
ADDRESS	STREET	COMMUNITY	ZIP	
WCHD-APC 9-07.0 COMPLAINT RECORD		WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION		

LOCATION ADDRESS	STREET	COMPLAINT NUMBER	10951	AREA AND GRID
1200 Zug Island				26-2455
Allied Signal			Detroit	
COMPANY AND/OR OCCUPANCY	DATE	TIME	COMMUNITY	ZIP
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE	3-10-94	9:50 A.M.	JD	DA ROCHA



At 9:30 A.M., Raj Sinha and Victor Vecsernyes observed 20% opacity exiting A-S's tall stack.

1 NOTICE ACTIVE	3 FURTHER SURVEIL.	5 CORRECTIVE MEAS.	7 REFER OTHER BUREAU	9 NO JURISDICTION
2 NOTICE ISSUED	4 NO CAUSE	6 COND. CORRECTED	8 INCORRECT ADDRESS	INSPECTION REPORT
PREVIOUS COMPLAINTS	CAR NUMBER AND TIME	INSPECTOR'S SIGNATURE	PHONE	DATE
COMPLAINANT			281-8396	3-10-94
Victor Vecsernyes				
Downriver Office				
ADDRESS	STREET	COMMUNITY	ZIP	
WCHD-APC 9-07.0 COMPLAINT RECORD		WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION		



LOCATION ADDRESS STREET COMPLAINT NUMBER 10954 AREA AND GRID  
1200 Zug Island 26-2455  
Allied Signal Detroit  
COMPANY AND/OR OCCUPANCY  
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME TAKEN BY INSPECTOR  
3-15-94 1:30 P.M. JD DA ROCHA



Heavy smoke between 7:00 P.M. and 8:00 P.M. last night.

1 NOTICE ACTIVE 3 FURTHER SURVEILL. 5 CORRECTIVE MEAS. 7 REFER OTHER BUREAU 9 NO JURISDICTION  
2 NOTICE ISSUED 4 NO CAUSE 6 COND. CORRECTED 8 INCORRECT ADDRESS + INSPECTION REQ.

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 3-17-94  
COMPLAINANT PHONE  
Curtis Thompson 842-4282  
8096 Logan  
ADDRESS STREET COMMUNITY ZIP  
WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION

LOCATION ADDRESS STREET COMPLAINT NUMBER 10957 AREA AND GRID  
1200 Zug Island 26-2455  
Allied Signal Detroit  
COMPANY AND/OR OCCUPANCY  
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME TAKEN BY INSPECTOR  
3-17-94 3:30 P.M. JN DA ROCHA



Thick, dark smoke spewing out of the station Tuesday and Wednesday.

1 NOTICE ACTIVE 3 FURTHER SURVEILL. 5 CORRECTIVE MEAS. 7 REFER OTHER BUREAU 9 NO JURISDICTION  
2 NOTICE ISSUED 4 NO CAUSE 6 COND. CORRECTED 8 INCORRECT ADDRESS + INSPECTION REQ.

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 3-17-94  
COMPLAINANT PHONE  
Curtis Thompson 842-4282  
8096 Logan  
ADDRESS STREET COMMUNITY ZIP  
WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION

LOCATION ADDRESS STREET COMPLAINT NUMBER 11002 AREA AND GRID  
1200 Zug Island Rd. 26-2455  
AlliedSignal Detroit  
COMPANY AND/OR OCCUPANCY  
COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME TAKEN BY INSPECTOR  
4-13-94 12:40 P.M. TM DA ROCHA



Smells like chemicals - moth balls - 7:00 A.M. - 8:30 P.M. and 11:30 P.M. - 12:00 on 4-12-94.

1 NOTICE ACTIVE 3 FURTHER SURVEILL. 5 CORRECTIVE MEAS. 7 REFER OTHER BUREAU 9 NO JURISDICTION  
2 NOTICE ISSUED 4 NO CAUSE 6 COND. CORRECTED 8 INCORRECT ADDRESS + INSPECTION REQ.

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 4-14-94  
COMPLAINANT PHONE  
Curtis Thompson 842-4282  
8096 Logan  
ADDRESS STREET COMMUNITY ZIP  
WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVISION





LOCATION ADDRESS STREET COMPLAINT NUMBER 11043 AREA AND GRID  
1200 Zug Island Rd. 26-2455  
Allied Signal Detroit

COMPANY AND/OR OCCUPANCY COMMUNITY ZIP  
TAKEN BY INSPECTOR

COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME 5-6-94 A.M.-Valet LS DA ROCHA

Houses immediately adjacent to the fence line by Cary & Medina Streets - there is significant vapor leak between tanks one and two. The tanks say they contain benzene materials.

1 NOTICE ACTIVE 2 NOTICE ISSUED 3 FURTHER SURVEIL. 4 NO CAUSE 5 CORRECTIVE MEAS. 6 COND. CORRECTED 7 REFER OTHER BUREAU 8 INCORRECT ADDRESS 9 NO JURISDICTION

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 5-6-94

COMPLAINANT Karen Kendrick Hands PHONE 313-885-7588

ADDRESS 1067 Devonshire Rd. Grosse Pte. Park ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIV.

LOCATION ADDRESS STREET COMPLAINT NUMBER 11079 AREA AND GRID  
1200 Zug Island Rd. 26-2455  
Allied Signal Detroit

COMPANY AND/OR OCCUPANCY COMMUNITY ZIP  
TAKEN BY INSPECTOR

COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME 6-16-94 4:15 P.M. VV DA ROCHA

Strong nathalene odors now and last night 6:15 P.M.

1 NOTICE ACTIVE 2 NOTICE ISSUED 3 FURTHER SURVEIL. 4 NO CAUSE 5 CORRECTIVE MEAS. 6 COND. CORRECTED 7 REFER OTHER BUREAU 8 INCORRECT ADDRESS 9 NO JURISDICTION

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 6-27-94

COMPLAINANT Curtis Thompson PHONE 842-4282

ADDRESS 8096 Logan STREET COMMUNITY ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIV.

LOCATION ADDRESS STREET COMPLAINT NUMBER 11163 AREA AND GRID  
1200 Zug Island 26-2455  
Allied Signal Detroit

COMPANY AND/OR OCCUPANCY COMMUNITY ZIP  
TAKEN BY INSPECTOR

COMPLAINT, WHEN OCCURRED, PROBABLE CAUSE AND SOURCE DATE TIME 6-27-94 2:50 P.M. JN DA ROCHA

Opacity exceedances.

1 NOTICE ACTIVE 2 NOTICE ISSUED 3 FURTHER SURVEIL. 4 NO CAUSE 5 CORRECTIVE MEAS. 6 COND. CORRECTED 7 REFER OTHER BUREAU 8 INCORRECT ADDRESS 9 NO JURISDICTION

PREVIOUS COMPLAINTS CAR NUMBER AND TIME INSPECTOR'S SIGNATURE DATE 6-27-94

COMPLAINANT Mr. Osburn PHONE 843-1900

ADDRESS 7701 W. Jefferson STREET COMMUNITY ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIV.



1200 Zug Island  
Allied Signal

COMPLAINT NUMBER **11179**

AREA AND GRID  
26-2455

Detroit

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

7-20-94

2:45 P.M.

JD

DA ROCHA



1. Napthalene odors between 11:00 P.M.  
and 11:30 P.M. on 7-19-94.

/plant.

2. A cloud of something was coming from

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEIL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU 8 NO JURISDICTION  
9 INCORRECT ADDRESS + INSPECTION REP

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE 7-21

COMPLAINANT

PHONE

Curtis Thompson

842-4282

8096 Logan

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVI

LOCATION ADDRESS

STREET

COMPLAINT NUMBER

**11245**

AREA AND GRID

1200 Zug Island  
Allied Signal

Detroit

26-2455

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

8-3-94

4:00 P.M.

NW

DA ROCHA



Strong benzene odor last night.

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEIL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU 8 NO JURISDICTION  
9 INCORRECT ADDRESS + INSPECTION REP

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE 8-18-94

COMPLAINANT

PHONE

Curtis Thompson

842-4282

8096 Logan

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVI

1200 Zug Island  
Allied Signal

COMPLAINT NUMBER **11317**

AREA AND GRID  
26-2445  
2455

Detroit

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

8-26-94

8:50 A.M.

JD

DA ROCHA



Odors all this week. Black stuff coming  
out of stack.

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEIL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU 8 NO JURISDICTION  
9 INCORRECT ADDRESS + INSPECTION REP

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE 9-8-94

COMPLAINANT

PHONE

Clayton Osborn/Bob Jones

843-1190

7701 W. Jefferson

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVI



1200 Zug Island Road  
Allied Signal

11359

AREA AND GRID  
26-2455

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

9-7-94 11:25 A.M.

JD

DA ROCHA



Numerous odor complaints from dock workers  
for August 25, 26, 1994.

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEILL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU  
8 INCORRECT ADDRESS

9 NO JURISDICTION  
10 INSPECTION REPT

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE

COMPLAINANT

Ms. Sandy Stanish  
Yellow Freight

PHONE

1-800-458-3323

ext 3193

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVIS

1200 Zug Island  
Allied Signal

11396

AREA AND GRID  
26-2455

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

9-13-94 8:45 A.M.

JD

DA ROCHA



Odors yesterday between 10:00 A.M. and  
11:00 A.M.

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEILL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU  
8 INCORRECT ADDRESS

9 NO JURISDICTION  
10 INSPECTION REPT

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE

COMPLAINANT

Bob Jones  
7701 W. Jefferson

PHONE

843-1900

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVIS

1200 Zug Island  
Allied Signal

11450

AREA AND GRID  
26-2455

COMPANY AND/OR OCCUPANCY

COMMUNITY

ZIP

COMPLAINT, WHEN  
OCCURRED, PROBABLE  
CAUSE AND SOURCE

DATE

TIME

TAKEN BY

INSPECTOR

9-22-94 9:40 A.M.

LS

DA ROCHA



12:15 A.M. 9-21-94 - Air smells of benzer  
and mothballs. It was so bad he had to use  
a side street. He was going east on  
Jefferson toward Springwells.

1 NOTICE ACTIVE  
2 NOTICE ISSUED

3 FURTHER SURVEILL.  
4 NO CAUSE

5 CORRECTIVE MEAS.  
6 COND. CORRECTED

7 REFER OTHER BUREAU  
8 INCORRECT ADDRESS

9 NO JURISDICTION  
10 INSPECTION REPT

PREVIOUS COMPLAINTS

CAR NUMBER AND TIME

INSPECTOR'S SIGNATURE

DATE

COMPLAINANT

Curtis Thompson  
8096 Logan

PHONE

842-4282

ADDRESS

STREET

COMMUNITY

ZIP

WCHD-APC 9-07.0 COMPLAINT RECORD

WAYNE COUNTY HEALTH DEPARTMENT, AIR POLLUTION CONTROL DIVIS



LOCATION ADDRESS

1200

Zug Island Road

AREA

26

GRID

2455

DATE

03

07

94

VIOLATION

0

COMPANY  
AND/OR OWNER

Allied Signal.

OCCUPANCY

RESPONSIBLE  
PERSON

Daryl Quinn 842-4400

TITLE

Plant Manager

ADDRESS

1200 Zug Island Road, Det, Michigan 48209

Fax 842-2804

APPARENT  
SOURCE  
AND/OR

Rudy Dawson, Supervisor Environmental Engineering

PROBABLE  
CAUSE

INSPECTOR DA ROCHA

## INSPECTION REPORT

VIOLATION  
CODEDAYS OR DATE  
TO COMPLYSOURCE  
CODEEQUIPMENT  
CODE

While attempting to contact Mr. Rudy Dawson I observed heavy activity coming from what turned out to be "Batch Still #4".

(1) Conducted SEO - attached. MOV is warranted.

(2) Mr. Dawson was not available. Spoke with Mr. Jeff Sielak.

He explained that A-S installed a new burner in Batch Still #4.

It was first lit at 1:00 PM. Heavy problems began at 2:00 PM.

(3) Spoke with Mr. Gordon Cole, Project Engineer. He confirmed Mr. Sielak's statements - working bugs out.

(4) Debugging should be completed at the end of this week (Friday, 8).

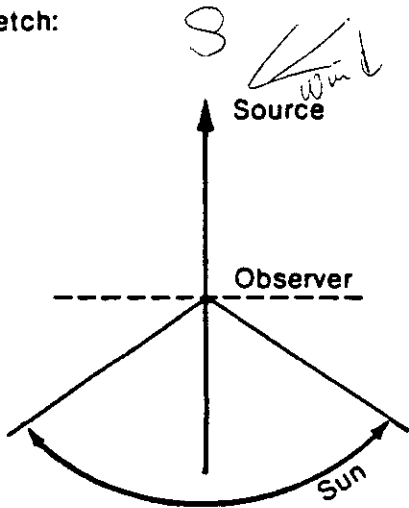
(5) Mr. Dawson to write a letter recounting the installation, debugging and activity outages of the new burner.

(6) Since it was an outage no MOV will be issued.

Return

**WAYNE COUNTY DEPARTMENT OF HEALTH**  
**Air Pollution Control Division**  
**VISIBLE EMISSION OR ODOR EVALUATION FORM**

Date: 3-7-94 Name: Allied-Signal  
 Observer: Da Rocha Address: 1200 Zug Island  
 Observation: Batch Still #4

	0	15	30	45	0	15	30	45
<b>Stack</b> — Distance From: <u>800'</u>	0	100	100	100	100	30		
— Height <u>50</u>	1	100	100	100	100	31		
<b>Wind</b> — Speed <u>3-5</u>	2	100	100	100	100	32		
— Direction <u>W/SW</u>	3	100	100	100	100	33		
<b>Sky Condition</b> <u>overcast</u>	4	100	100	100	100	34		
<b>Color of Emission</b> <u>black</u>	5	100	100	100	100	35		
<b>Plume Character</b> <u>lofting</u>	6					36		
— Fuel <u>crude oil</u>	7					37		
— Began <u>4:00 PM</u>	8					38		
— Ended <u>4:06 PM</u>	9					39		
<b>Sketch:</b>	10					40		
	11					41		
	12					42		
	13					43		
	14					44		
	15					45		
	16					46		
	17					47		
	18					48		
	19					49		
	20					50		
	21					51		
	22					52		
<b>Odor Description</b>	23					53		
	24					54		
<b>Remarks:</b> <u>Observation taken</u>	25					55		
<u>all south of 800' W.</u>	26					56		
<u>by floor</u>	27					57		
	28					58		
	29					59		

Observer's Signature: J. E. Da Rocha



March 29, 1994

Mr. Robert Zabick  
Enforcement Officer  
Wayne County Air Pollution Control Division  
640 Temple, Suite 700  
Detroit, Mi 48401

Re: Quarterly Excess Opacity Report, 1st. Quarter

Dear Mr. Zabick,


Please find enclosed the Quarterly Excess Opacity Report for the first quarter of 1994 for the Detroit Tar Plant. It should be noted, that this report will show only the exceedences for opacity and So2. Detailed information is available for inspection by Wayne County Air Pollution.

The limitation based on permit No. C-6291 for So2 is 282 ppm of wet flue gas, corrected to 50% excess air, on a three hour running average. The limitation for visible emissions is 10% opacity, based on a six minute running average time.

As evidenced, by the attached reports of exceedence, we were out of compliance 0.0% for the month of January 1994, 0.0% for the month of February 1994, and 0.0% for the month of March 1994 for So2 emissions. For visible emissions, we were out of compliance 0.94% for the month of January 1994, 2.17% for the month of February 1994, and 0.0% for the month of March 1994.

Any question regarding this information should be directed to Rudolph Dawson, Environmental and IH supervisor, at 842 - 5480.

Sincerely,



Rudolph Dawson  
Environmental and IH Supervisor

c: Finn Bohn - MTO  
Daryl Quinn  
Robert O'Brien



AlliedSignal, Inc.  
Detroit Tar Plant  
Monthly Report for January 1994  
Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
01/06/94	2:00 a.m.	6 min.	12.0%	Baghouse plugged
01/06/94	6:00 a.m.	90 min.	12.0%	Bad Bags in Baghouse
01/14/94	5:30 p.m.	6 min.	12.0%	Fuel Problems
01/15/94	2:00 a.m.	24 min.	12-28%	Fuel Problems
01/15/94	10:00 a.m.	30 min.	11-16%	Fuel Problems
01/16/94	12:00 a.m.	6 min.	13.0%	Bad Bags in Baghouse
01/16/94	12:06 a.m.	462 min.	12-30%	Bad Bags in Baghouse

So2 EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
------	------	----------	---------	--------

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.



AlliedSignal, Inc.  
Detroit Tar Plant  
Monthly Report for February 1994  
Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
02/05/94	10:00 p.m.	120 min.	10-20%	Bad Bags in Baghouse
02/06/94	12:00 a.m.	600 min.	10-20%	Bad Bags in Baghouse
02/08/94	3:30 p.m.	6 min.	36.0%	North Downport plugged
02/08/94	3:36 a.m.	6 min.	34.0%	North Downport plugged
02/08/94	3:42 a.m.	6 min.	12.0%	North Downport plugged
02/08/94	10:06 p.m.	24 min.	12-35%	North Downport plugged
02/08/94	11:30 p.m.	12 min.	12-13%	North Downport plugged
02/09/94	1:12 a.m.	24 min.	13-20%	North Downport plugged
02/09/94	2:30 a.m.	6 min.	22.0%	South Downport plugged
02/17/94	11:30 p.m.	30 min.	22-40%	Residual ash from baghouse changeout.
02/17/94	5:45 a.m.	42 min.	12-40%	FBB was on preheat burners only No opacity during this time.

So2 EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
------	------	----------	---------	--------

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.



AlliedSignal, Inc.  
Detroit Tar Plant  
Monthly Report for March 1994  
Opacity and So2 Exceedences

OPACITY EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
------	------	----------	---------	--------

THERE WERE NO OPACITY EXCEEDENCES TO REPORT FOR THE MONTH.

So2 EXCEEDENCE

DATE	TIME	DURATION	OPACITY	REASON
------	------	----------	---------	--------

THERE WERE NO So2 EXCEEDENCES TO REPORT FOR THE MONTH.

THE FBB WAS SHUTDOWN ON MARCH 18, 1994 AND WILL BE DOWN UNTIL  
FURTHER NOTICE.





LOCATION ADDRESS

1200

Zug Island Road

AREA

26

GRID

2455

DATE

05

13

94

VIOLATION

O

COMPANY  
AND/OR OWNER

Allied Signal.

RESPONSIBLE  
PERSON

Daryl Quinn 842-4400

ADDRESS

1200 Zug Island Road, Det, Michigan 48209

APPARENT  
SOURCE  
AND/OR  
PROBABLE  
CAUSE

Rudy Dawson, Supervisor Environmental Engineering

OCCUPANCY

TITLE Plant Manager

Fax 842-2804

INSPECTOR DA ROCHA

## INSPECTION REPORT

VIOLATION  
CODEDAYS OR DATE  
TO COMPLYSOURCE  
CODEEQUIPMENT  
CODE

While at another site conducting an inspection with Mr. Gary Krowiec, Supervisor, Raj Sinha, accompanied by Dr. Peter Wamr, telephone to check out Allied-Signal for an opacity problem.

Upon arrival at the plant I observed that all stacks were clear. Spoke with Messrs Daryl Quinn, Plant Manager and Bob O'Brien, Environmental.

① Mr. O'Brien stated that when Messrs Sinha and Wamr arrived Tor Still #4 stack was smoking.

NOTE: A-S installed a new burner for Tor Still #4 a month ago. They have had problems and continue to fine tune the burner. A-S has called me every day they worked on the burner in preparation for opacity problems and complaints.

② Tor Still #4 stack began emitting excess opacity at 1:00 PM. Opacity stopped at 1:05 PM.

③ Mr. Quinn admitted to a problem with debugging the burner but it will not be a permanent problem.

④ A-S will continue to make corrections/regime to the burner until it runs clear.

FILE



1200

Zug Island Road

26

2455

05

26

94

COMPANY  
AND/OR OWNER

Allied Signal.

OCCUPANCY

RESPONSIBLE  
PERSON

Daryl Quinn 842-4400

TITLE

Plant Manager

ADDRESS

1200 Zug Island Road, Det, Michigan 48209

Fax 842-2804

APPARENT  
SOURCE  
AND/OR

Rudy Dawson, Supervisor Environmental Engineering

PROBABLE  
CAUSE

INSPECTOR DA ROCHA

## INSPECTION REPORT

VIOLATION  
CODEDAYS OR DATE  
TO COMPLYSOURCE  
CODEEQUIPMENT  
CODE

This is a continuation of a C.R. initiated by Raj Sester a  
party from Tor Still #4. He spoke with Philip Kinkasa and  
Philip asked me to obtain a sample of material "As Fined".

Spoke with Messrs Rudy Dawson, Bob O'Brien and Gordon Cole.  
(1) The material found in Tor Still #4 is finely ground Coal Tor  
Buttons mixed with Carbon Black Feed Stock (another form of  
Coal Tor Button). They are at a 50-50 mix. AS would  
like to go to a 75-25 mix utilizing more Coal Tor Buttons  
than Carbon Black.

(2) Opportunity is due to problems when they change the mix ratios.  
This is a Research & Development (R&D) problem.

(3) Messrs D. Quinn, R. Dawson + G. Cole will meet  
myself to (a) produce a better outlining the  
process they have been going thru.

(b) produce an "Action Plan" with a  
final/completion date.

(4) We reached out into the plant. I obtained a split  
sample of material from Tank #63 - ~~As Fined~~ to  
Tor Still #4. See attached.

Return

Air Pollution Control Division  
Wayne County Health Department  
640 Temple Street, Suite 700  
Detroit, Michigan 48201  
Telephone (313) 832-5000  
Facsimile (313) 832-5066

Sample # 94-93

Date Submitted 5-27-94

REQUEST FOR SAMPLE ANALYSIS

SAMPLE INFORMATION

Name Allied-Signal  
Address 1200 Zuy Island City Detroit County Wayne  
Sampling: Date 5-26-94 Time 4:30 PM  
Sample Condition "As Found" from tank #13 to Tank Stall #4  
Collection Method Scrubber  
Field Inspector Dr. Rocha Return Results to \_\_\_\_\_  
Pollution Occurrence: Date \_\_\_\_\_ Time \_\_\_\_\_  
Weather Conditions \_\_\_\_\_  
Additional Information This material is a 50-50 mix of Carbon Black Fuel and Coal Tar Bottoms

POSSIBLE POLLUTANT SOURCES

1. Suspected Source Sulfur / Organic Halides / Alkyls: Mercury, lead, Cadmium  
Source Type \_\_\_\_\_  
Substances Suspected \_\_\_\_\_
2. Suspected Source \_\_\_\_\_  
Source Type \_\_\_\_\_  
Substances Suspected \_\_\_\_\_

RESULTS

Date Seal Broken \_\_\_\_\_ Resealed \_\_\_\_\_ By \_\_\_\_\_  
0.51% SULFUR  
21.3 PPM Pb  
0.26 PPM Cd  
Too little chromium to detect.

ANALYTICAL METHOD

- ☐ Optical Microscopy  
☐ P. L. Microscopy  
☐ X-ray Diffractometry  
☐ Chemical Spot Tests  
☒ A. A. Spectroscopy  
☒ Other Iodometric Titration

Date Results Reported June 20, 1994

Date Results Issued 6-20-94

Chemist J.O.K.

Fred Muxlow  
Fred Muxlow

LOCATION ADDRESS

1200

Zug Island Road

AREA

26

GRID

2455

DATE

060194

VIOLATION

COMPANY  
AND/OR OWNER

Allied Signal,

OCCUPANCY

RESPONSIBLE  
PERSON

Daryl Quinn 842-4400

TITLE

Plant Manager

ADDRESS

1200 Zug Island Road, Det, Michigan 48209

Fax 842-2804

APPARENT  
SOURCE  
AND/OR  
PROBABLE  
CAUSE

Rudy Dawson, Supervisor Environmental Engineering

INSPECTOR DA ROCHA

## INSPECTION REPORT

VIOLATION  
CODEDAYS OR DATE  
TO COMPLYSOURCE  
CODEEQUIPMENT  
CODE

1200 Zug Island Road, Det, Michigan 48209  
Rudy Dawson, Supervisor Environmental Engineering

① Conducted SEO - observed heat shimmer above the  
stock pit.

② NO opacity was observed.

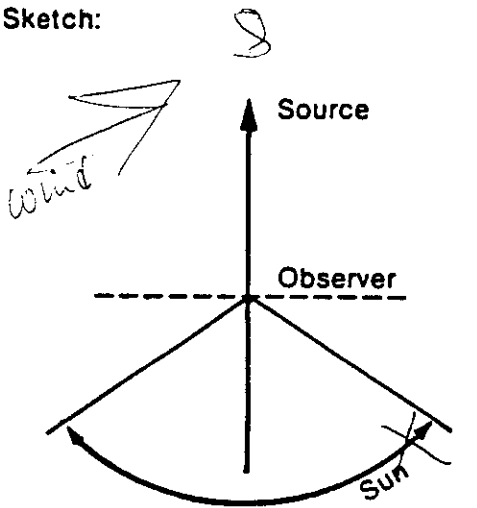
Return

**WAYNE COUNTY DEPARTMENT OF HEALTH**  
**Air Pollution Control Division**  
**VISIBLE EMISSION OR ODOR EVALUATION FORM**

Date: 6-1-94 Name: Allied Signal

Observer: Don Rubin Address: 1200 Zing Island

Observation: Tar. Still #4 stroke 0 15 30 45 0 15 30 45

	0					30	C	O	O	O
Stack — Distance From: <u>1,000'</u>	1					31	O	O	O	O
— Height <u>100'</u>	2					32	C	O	C	O
Wind — Speed <u>5-10</u>	3					33	C	O	O	O
— Direction <u>N/E</u>	4					34	O	O	O	O
Sky Condition <u>partly cloudy</u>	5					35	O	O	O	O
Color of Emission	6					36	C	O	C	O
Plume Character <u>lumpy</u>	7					37	O	O	O	O
— Fuel <u>Gas to Bottom</u>	8					38				
— Began <u>3:20 PM</u>	9					39				
— Ended <u>3:38 PM</u>	10					40				
Sketch: 	11					41				
	12					42				
	13					43				
	14					44				
	15					45				
	16					46				
	17					47				
	18					48				
	19					49				
	20	O	t	O	O	50				
21	O	O	O	O	51					
Odor Description	22	C	C	O	C	52				
	23	C	C	C	C	53				
	24	C	O	C	O	54				
Remarks: <u>Observation taken from</u>	25	C	C	O	O	55				
<u>to alley to 8019 W. Jefferson</u>	26	O	C	O	C	56				
	27	C	O	O	O	57				
	28	O	C	O	C	58				
	29	C	C	O	C	59				

Observer's Signature: J. E. G. Gable

**MEMORANDUM ■ WAYNE COUNTY HEALTH DEPARTMENT**  
**Air Pollution Control Division**

File  
13

TO: The File

FROM: J. E. Da Rocha, Air Pollution Control Inspector

DATE: May 12, 1994

SUBJECT: Complaint Referral on ALLIED SIGNAL  
1200 Zug Island Road  
Detroit, MI 48209

Inspection Date: May 6, 1994

I spoke with Mrs. Karen Kendrick-Hands at about noon on Friday, May 6, 1994 via telephone (313) 885-7588. She stated that at 4:15 P.M. on May 5, 1994, she and her husband observed a leak from the 12" diameter pipe between tanks 1 and 2. The plume travelled toward the green house on Cary Street. She said, "It smelled like benzine, a chemical smell/asphalt." A sign on the tank says "Caution - Benzine." The wind was from the Rouge River.

She further stated that her husband's firm has been hired by the Delray community to handle odor issues. She was concerned that she had a contractor relationship with the community but that she was complaining as a private citizen. She was also surprised that she did not receive a call last night. It was now 18 hours since she called the complaint to the answering service.

Prior to entering the plant, I drove via side streets to Allied Signal's north perimeter where the 5 cooling tanks are located. I could not see the Benzine signage from W. Jefferson. It was not until I was on Barnes Street, within 25' of the tanks, that I could read the signage. I observed a steam plume between tanks 1 and 2.

Spoke with Mr. Bob O'Brian, from Environmental. We discussed the Complaint Referral. Tank #1 contains recirculated water, tank #2 contains driveway sealer tar base (DST). After checking his records, he responded that there was no processing of these tanks during the time frame of the Complaint Referral.

We walked to the north perimeter of the plant where tanks 1 thru 5 are located. At the base of tank #1 (south site, not observable from Barnes Street) I observed 2 steam lines with three valves - one valve was partially open to handle blow by. Steam from this open valve was carried by the wind between tanks 1 and 2. It is my determination that the open valve was the source of the steam plume observed yesterday between tanks 1 and 2.

JD:LS

Attachments

cc: R. Sinha  
P. Warner  
G. Krawiec  
R. Zabick

4/13/94

# **STORAGE TANKS** **CONTENTS & CAPACITIES**

TANK NO.	CONTENTS	CAPACITY GALLONS
1	WATER	53,500
2	DST	53,500
3	TAR BOTTOMS	53,500
4	COAL TAR PITCH	53,500
5	TAR BOTTOMS	53,500
E	COAL TAR OIL	5,700
R	CARBOLIC OIL	12,500
S	COAL TAR OIL	12,500
V	COAL TAR OIL	12,500
W	COAL TAR OIL	12,500
X	COAL TAR OIL	12,500
Y	OUT OF SERVICE	12,500
50	COAL TAR PITCH	50,000
51	COKE OVEN TAR	250,000
52	COKE OVEN TAR	500,000
53	COKE OVEN TAR	250,000
54	COKE OVEN TAR	250,000
56	COKE OVEN TAR	78,000
57	COAL TAR PITCH	75,000
58	COAL TAR OIL	100,000
59	COKE OVEN TAR	71,000
60	COKE OVEN TAR	71,000
62	# 2 FUEL OIL	16,800
63	COKE OVEN TAR	20,000
64	COAL TAR OIL	27,000
65	COAL TAR OIL	250,000
66	SYBILL MATERIAL	250,000
70	OIL PITCH	100,000
71	L.C.O.R.	29,000
73	EMPTY	26,000
75	EMPTY - OPEN	28,000
77	COAL TAR OIL	11,000
78	ROOFING PITCH	20,000
81	EMPTY	10,000
82	EMPTY	10,000
83	EMPTY	10,000
1 BLO TK.	COAL TAR PITCH	13,000
2 BLO TK.	COAL TAR PITCH	13,000
3 BLO TK.	COAL TAR PITCH	10,000

**NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL. REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO THE ENVIRONMENTAL DEPARTMENT.**



4/13/94

# STORAGE TANKS CONTENTS & CAPACITIES

TANK NO.	CONTENTS	CAPACITY GALLONS
544	COKE OVEN TAR	1,000,000
714	WASTE WATER	250,000
715	COAL TAR OIL	250,000
716	WASTE WATER	250,000
717	EMPTY	100,000
718	COKE OVEN TAR	78,000
719	CARBOLIC OIL	50,000
720	CARBOLIC OIL	50,000
721	CARBOLIC OIL	50,000
722	CARBOLIC OIL	50,000
723	CARBOLIC OIL	50,000
834	TAR BOTTOMS	50,000
835	COKE OVEN TAR	50,000
1220	COAL TAR OIL	1,000,000
ST-1	T.H. WASTE WATER	50,000
ST-2	LCOR/CARBOLATE	5,000
ST-3	T.H. WASTE WATER	50,000
ST-4	CAUSTIC	2,000
# 2 BATCH STILL	C.O. TAR OR OIL PITCH	10,000
# 3 BATCH STILL	C.O. TAR OR OIL PITCH	12,500
# 4 BATCH STILL	C.O. TAR OR OIL PITCH	12,500
REC. SCRUBBER	CONTAMINATED WATER	3,000
50 TK. SCRUBBER	CONTAMINATED WATER	3,750
T/C SCRUBBER	CONTAMINATED WATER	3,000
CARB. OIL SCRUBBER	CONTAMINATED WATER	3,750
A.R.M. SCRUBBER	EMPTY	1,000
ARM RECIEVING VESSEL	EMPTY	40,000
SULFURIC ACID TK.	93% SULFURIC ACID	5,000
NEUT. TK.	CONTAMINATED WATER	2,000
COALESCER	CONTAMINATED WATER	2,000
VENT CONDENSER - COOLERS	CONTAMINATED WATER	10,000
GAS TANK	UNLEADED GASOLINE	1,000
DIESEL TANK	DIESEL FUEL	1,000
2 EA. HI FLASH REC.	EMPTY	580 EACH

NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL.  
REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO  
THE ENVIRONMENTAL DEPARTMENT.

4/13/94

**STORAGE TANKS**  
**CONTENTS & CAPACITIES**

TANK NO.	CONTENTS	CAPACITY GALLONS
PITCH BAY 14	EMPTY	N.A.
PITCH BAY 15	EMPTY	N.A.
PITCH BAY 16	RFG. PITCH STORAGE	N.A.
PITCH BAY 17	RFG. PITCH STORAGE	N.A.
PITCH BAY 19	EMPTY	N.A.
API OIL WATER SEPARATOR	WASTE WATER	33,225
FILTER PRESS TK. #68	EMPTY	12,000
FILTER PRESS TK. #69	EMPTY	6,000
FILTER PRESS PRECOAT TK.	EMPTY	2,000
FILTER PRESS FILTRATE TK. 1	EMPTY	2,000
LARGE SUMP	REMOVED FROM SERVICE	0
SMALL SUMP	COKE OVEN TAR	27,500

**NOTE: CONTENTS OF THE LISTED TANKS CONTAIN HAZARDOUS MATERIAL.  
REFER TO THE APPROPRIATE MSDS. ANY QUESTION SHOULD BE DIRECTED TO  
THE ENVIRONMENTAL DEPARTMENT.**

**AIR POLLUTION CONTROL DIVISION**

**MAIN OFFICE**

640 Temple Street, Suite 700  
Detroit, Michigan 48201

(313) 832-5000

FAX: (313) 832-5066

**DOWNRIVER OFFICE**

Eureka Road

231 Eureka Road

Wyandotte, Michigan 48192

(313) 281-8396

FAX: (313) 281-6973



**EDWARD H. McNAMARA**

County Executive

**Bernard N. Kilpatrick**

Assistant County Executive

**Cynthia Tauog, MPH**

Director-Health Officer

**Donald Lawrenchuk, M.D., MPH**

Medical Director

August 4, 1994

Allied-Signal  
1200 Zug Island Road  
Detroit, MI 48209

Attn: Mr. Daryl Quinn, Plant Manager

Hammermill/Mixer/Briquettor and venturi scrubber #7602 and #7626 are being revoked per Section 408, of the Wayne County Air Pollution Control Ordinance, Part C, 3, which states:

"If an emission source is not used or operated for 24 consecutive months, the certificate of operation shall be revoked with notice, unless a longer period of non-operation has been approved by the Division as a condition of the certificate, or the emission source is taken out of service temporarily for maintenance, repairs, economic reasons or for other cause acceptable to the Division."

If this division receives no response within 15 days of the date of this letter, all applicable certificates of operation will be revoked and equipment affected may be returned to use or operation only after applying for an installation permit under Section 401 of the Wayne County Air Pollution Control Ordinance and complying with all the requirements of that section.

Respectfully,

J.E. DaRocha

Air Pollution Control Inspector

c: Engineering Section

(a:AlliSig.let/wpJDnmw)





Allied-Signal Inc.  
Detroit Tar Plant  
1200 Zug Island Road  
Detroit, MI 48209  
Telephone (313) 842-4400

Mr. Jack Da Rocha, WCAPC Inspector  
Wayne County Dept. of Public Health  
640 Temple Street, Suite 700  
Detroit, MI 48209

Dear Mr. Da Rocha

The purpose of this letter is to explain the reason for the opacity exceedances that have been observed from time to time while operating the new burner on the #4 Tar Still at the Detroit Tar Plant.

This burner was installed for purposes of being able to fire coal tar oil that has a higher viscosity content than the other coal tar oil which is fired on the other burners at the plant. Initially, the opacity was attributed to insufficient combustion air. The combustion air problem has since been addressed and corrected. It is important to note that the fuel used during the initial start-up of this burner was the fuel used on the other burners in the plant. This was done to minimize problems that are common when starting up new pieces of equipment.

Once we were satisfied with the reproducibility of the start-up and operation of the burner when using the existing plant fuel, we began operating it using a blend of the fuel having the higher viscosity content (HVF) and the existing plant fuel (EF). The initial blend was 1/3 HVF and 2/3 EF. This blend could be fired using the same parameters as before. Parameters include the pressures the fuel and atomizing steam are kept at.

The next blend was 1/2 HVF and 1/2 EF. Opacity problems developed here occasionally because it was found the fuel pressure had to be increased in order for the burner to function properly. Eventually the proper parameters were found and recorded. This is the blend we are currently using.

The next step will involve increasing the HVF content until it is found it is not feasible to add anymore. Whether this ultimate blend will be 3/4 HVF and 1/4 EF or 100% HVF remains to be seen. At this point we will insure there is reproducibility in firing this blend and the parameters will be recorded and utilized in the subsequent start-ups of this burner. The major problems with the burner are behind us so the time period it will take to do this should not be long.

Your cooperation in this matter is greatly appreciated.

Sincerely,


Gordon Cale

cc R. Smith



LOCATION ADDRESS			
1	2	0	0

## ZUG ISLAND ROAD

AREA		GRID				DATE				VIOLATION		
2	6	2	4	5	5	0	8	2	9	9	4	

COMPANY  
AND/OR OWNER  
RESPONSIBLE  
PERSON  
ADDRESS  
APPARENT  
SOURCE  
AND/OR  
PROBABLE  
CAUSE

# Allied Signal

Daryl Quinn (842-4400)

1200 Zug Island , Detroit, MI 48209

Bob O'Brien, Enviromental

OCCUPANCY

TITLE Plant Manager

FAX 842-2804

INSPECTOR

DA ROCHA

# INSPECTION REPORT

[illegible]



August 5, 1994

Mr. Jack DaRocha  
Enforcement Officer  
Wayne County Air Pollution Control  
640 Temple, Suite 700  
Detroit, MI 48401

Re: Fluidized Bed Boiler Opacity

Dear Mr. DaRocha

As you know, the Fluidized Bed Boiler (FBB) has been idle since March 18, 1994 due to lack of fuel. We are actively pursuing permits which will allow us to burn alternative fuels in the FBB. Until the time that we receive the additional operating permits, the FBB will remain idle. We request your guidance in the resolution of the opacity CEM location problem.

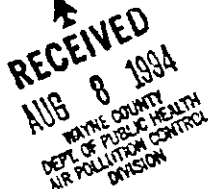
Please note that relocation of the opacity CEM in compliance with 40 CFR Part 60, Appendix B, Spec 1 will not be a practical solution to this issue. The FBB and York Shipley Boiler share a common stack at the specified compliance location, and differentiation between the two exhaust streams is not possible when both boilers are on line at the same time.

If you have any questions regarding this information, feel free to contact me at 842 5871.

Sincerely,

Robert A. O'Brien  
Environmental Assistant

cc: Daryl Quinn - Detroit  
Finn Bohn - MTO  
Rick Goetz - Ironton  
Bill Yanovitch - Chesterfield



A  
T  
T  
E

*Jack*  
*Lets finally resolve this CEM issue. Work with Jamal and Daisee and lets agree on what is acceptable. This issue seems to be never ending.*  
*Frank*  
*12*



LOCATION ADDRESS  
1 2 0 0

ZUG ISLAND ROAD

AREA GRID DATE VIOLATION  
2 6 2 4 5 5 0 9 0 8 9 4

COMPANY  
AND/OR OWNER  
RESPONSIBLE  
PERSON  
ADDRESS  
APPARENT  
SOURCE  
AND/OR  
PROBABLE  
CAUSE

Allied Signal

Daryl Quinn (842-4400)

1200 Zug Island, Detroit, MI 48209

Bob O'Brien, Enviromantal

OCCUPANCY

TITLE Plant Manager

FAX 842-2804

INSPECTOR

DA ROCHA

Complaint Register - 1

## INSPECTION REPORT

VIOLATION CODE	DAYS OR DATE TO COMPLY	SOURCE CODE	EQUIPMENT CODE
	<p>Attempted to speak with Mr. Clayton Osborn. He was not in.</p> <p>① Spoke with his secretary, Mrs. Shirley Dein (Dein)</p> <p>② She complained about observing black smoke at 11:45 AM on August 25, 1994. She observed it only when she was outside (10-15 minutes). She did not see what it subsided.</p> <p>③ I asked that if Mr. Osborn had any questions he could call me tomorrow AM.</p> <p>Spoke with Mr. Bob Jones.</p> <p>① He provided me with copies of the 5 internal complaints - see attached.</p> <p>② Workers complained about particulate material on their windshields most. I asked that he call me so that I can take samples - analysis can help us determine the source.</p> <p>③ I reminded him that details such as date, time, duration, wind direction, odor description, quantity descriptions were important and that workers should include all possible data.</p> <p>Conducted an Oda Evaluation on V F project at the south fence line, just east/south east of A.S. An NAK is not warranted.</p> <p>Spoke with Mr. Bob O'Brien.</p> <p>① Informed him of the CR.</p> <p>② He checked his records. The wind was out of the west/north west predominantly during August 25+26, 1994.</p>		

INSPECTION REPORT			
OLATION ODE	DAYS OR DATE TO COMPLY	SOURCE CODE	EQUIPMENT CODE
(3)	On the days referenced A-S was purifying Tar Still #3 distilling (D#) petroleum based material (SYBILL)		
(4)	Tar Still #3 forms are routed thru an air scrubber		
(5)	There was nothing in the log indicating an outage during the C.R. time frame.		
(6)	When Bob O'Brien is out of town Mr. Doyle Quinn calls in any "Outages".		
FILE			

# VISIBLE EMISSION OR ODOR EVALUATION FORM

Date: 4-8-94 Name: Alfred - Sinner

Observer: D. Kohn Address: 1200 Zoo Island

Observation:	0	15	30	45	0	15	30	45
Order Evolution								

		0						30					
Stack — Distance From: <u>500'</u>		1						31					
— Height <u>4'</u>		2						32					
Wind — Speed <u>10</u>		3						33					
— Direction <u>W</u>		4						34					
Sky Condition <u>Some</u>		5						35					
Color of Emission <u>N/A</u>		6						36					
Plume Character <u>N/A</u>		7						37					
— Fuel <u>N/A</u>		8						38					
— Began <u>3:43 PM</u>		9						39					
— Ended <u>3:54 PM</u>		10						40					
Sketch: <u>VW</u>		11						41					
		12						42					
		13							43				
		14							44				
		15						45	1	0	1	0	
		16						46	1	2	1	1	
		17						47	2	2	0	1	
		18						48	1	2	0	0	
		19						49	1	1	2	1	
		20						50	1	0	1	2	
		21						51	2	0	0	0	
Odor Description <u>Roofing tar</u>		22						52	1	0	0	0	
	23						53	0	0	0	1		
Remarks: <u>Observation taken from Yellow Freight's parking lot at south fence line.</u>		24						54					
	25						55						
	26						56						
	27						57						
	28						58						
	29						59						

**Observer's Signature:**



## BUSINESS BRIEFS

WSJ 10/28/94

### **AlliedSignal's Third-Quarter Profit Rose 15% to a Record \$189 Million**

MORRISTOWNSHIP, N.J. — AlliedSignal Inc. said its third-quarter profit rose 15% to a record \$189 million, or 67 cents a share.

Chairman Lawrence A. Bossidy said in an interview that he expects the current earnings momentum to continue at least through 1997. Citing a "decent economy" in the U.S. and emerging strengths in the company's markets in Europe, he estimated that profit for next year will be up "13% to 17%" from this year.

The latest net compared with \$165 million, or 58 cents a share, in the year-ago period. Sales rose 11% to \$3.1 billion from \$2.8 billion a year earlier.

Mr. Bossidy said each of the company's three businesses posted double-digit earnings increases. And for the first time in four years, he said, all three businesses posted sales increases. The company, which is based in Morris Township, N.J., makes automotive and aerospace products and engineered materials.

In late New York Stock Exchange trading, AlliedSignal fell 12.5 cents to \$34.375.

The latest results, which were in line

with Wall Street analysts' expectations, were helped by the company's continuing cost-cutting measures and productivity improvements.

Mr. Bossidy said he's "comfortable" with analysts' estimate that the company will earn 71 cents a share in the fourth quarter. That would be a "13% increase" from the strong year-ago quarter. If AlliedSignal were to report that amount for the fourth quarter, the company's full year net income would amount to \$2.66 a share, compared with the 1993 net income of \$2.31 a share.

In making a forecast of his own, Mr. Bossidy said he expects the company's 1994 earnings to range between \$2.61 and \$2.70 a share.

For the nine months, the company posted earnings of \$554 million, or \$1.95 a share, compared with restated profit of \$233 million, or 83 cents a share, a year earlier. Excluding the accounting changes related to post-employment benefits in the 1993 period, the company earned \$478 million, or \$1.69 a share.



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

MARLENE J. FLUHARTY  
GORDON E. GUYER  
STEWART MYERS  
RAYMOND POUPORE

JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
P.O. BOX 30028  
LANSING, MI 48909

DELBERT RECTOR, Director

August 5, 1991

Ms. Shari Kolak, 5HR-13  
Michigan Section  
RCRA Permitting Branch  
U.S. EPA - Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

Dear Ms. Kolak:

SUBJECT: Allied Signal, Inc., Detroit  
MID 005 517 198

The facility's information relative to a nonhazardous waste determination for a waste pile at the Detroit Tar Plant has been reviewed, as requested by Mr. Richard Traub in his May 22, 1991, letter to Mr. Steve Buda. Due to a lack of specific information in the submittal from Allied Signal, a meeting with the company was requested by Waste Management Division (WMD) staff. Due to scheduling conflicts between facility and WMD staff, this meeting did not take place until July 24, 1991. During the meeting, Mr. William Yanovitch of Allied Signal explained the basic purpose, associated sampling plan, and actual field work that was done in support of this waste characterization effort.

Based upon Mr. Yanovitch's explanation of the sampling plan, and a visual inspection of the waste pile, it is felt that a representative sampling of the waste was accomplished. The protocol used in the field followed good standard quality assurance/quality control (QA/QC) practice. The innovations used to collect samples at depth were of interest, especially in consideration of the nature of the material.

The data that was generated from the sampling was analyzed by a laboratory that followed accepted QA/QC procedures. Mr. Yanovitch supplied the laboratory documentation relative to the sampling for review. It is attached to this letter for your information and files. The resultant data was statistically analyzed by both Allied Signal and WMD staff. Under both statistical protocols, based upon the waste material, and the ultimate planned use of said material, the



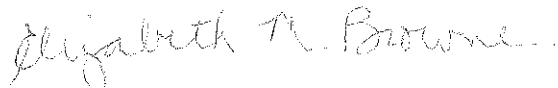


August 5, 1991

level of benzene falls below the regulatory threshold. If the benzene level, relative to the toxic characteristic leaching procedure (TCLP), was the only concern relative to the classification of this material, it should be considered nonhazardous.

This concludes a summary of the review of the original document, and the information provided by Allied Signal staff both during and after our meeting of July 24, 1991. If you have any other questions regarding this issue, please contact me.

Sincerely,



Elizabeth M. Browne  
Env. Monitoring Coordinator  
Waste Management Division  
517-373-7974

Attachment

cc: Mr. Richard Traub, U.S. EPA  
Mr. Steve Buda, MDNR  
Ms. De Montgomery, MDNR  
Ms. Liane Shekter Smith, MDNR  
HWP/C&E File



SEP 16 1991

G.H. Collingwood  
Vice President and General Manager  
Tar Products  
Allied Signal, Incorporated  
P.O. Box 1053R  
Morristown, NJ 07962

5HR-13

Re: Allied Signal  
Detroit Tar Plant  
MID 005 517 198

Dear Mr. Collingwood:

This purpose of this letter is to inform you that the documentation, supporting the nonhazardous waste determination for a waste pile at the Detroit Tar Plant, has been reviewed.

Based on this review, the United States Environmental Protection Agency (U.S. EPA) and the Michigan Department of Natural Resources concur with Allied Signal's nonhazardous waste determination. Therefore, the U.S. EPA hereby withdraws Allied Signal's Part A application, filed on September 25, 1990.

If you have any questions regarding this letter, please contact Shari Kolak of my staff, at (312) 886-6151.

Sincerely,

Rich Traub, Chief  
Michigan Section  
RCRA Permitting Branch

cc: Liane Shekter Smith (MDNR)

12 9/13/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA PERMITTING BRANCH (RPB)										
TYPIS	AUTH.	ILS CHIEF	INS CHIEF	MIS CHIEF	MN/WI CHIEF	OHS CHIEF	SWS CHIEF	RPB CHIEF	RCRA ASOC.DR	WASTE MGMT. DIV.DIRECTOR
	SUK 9-13-91			RST 9/13/91						



EPA

1. EPA ID: MID ~~005789~~ 048222601
2. HANDLER: Bendix Guidance System
3. ADDRESS: \_\_\_\_\_

NEW

UPDATE

5. Date of initial evaluation which is the basis for this report:

8/25/88

- 5a. Agency responsible for evaluation: \_\_\_\_\_  
(circle as applicable)

E = EPA (S) = State C = Contractor/EPA  
B = Contractor/State  
X = Oversight

6. Type of Evaluation Covered in this Report:

(circle as applicable)

- |                                       |                                      |
|---------------------------------------|--------------------------------------|
| 1 = CFI (Compliance Eval. Inspection) | 7 = Part B Call-in Inspection        |
| 2 = Sampling Inspection               | 8 = Part A Withdrawal Inspection     |
| 3 = <u>Record Review</u>              | 9 = Closed Facility/Units Inspection |
| 4 = CME (Comprehensive GWM Eval.)     | 10 = Other General Inspection        |
| 5 = Compliance Schedule Evaluation    | 11 = Case Development Inspection     |
| 6 = Citizen Complaint                 | 12 = O&M Inspection                  |
|                                       | 13 = CA Oversight Inspection         |

Facility Inspected As: (S/T) LDF Trans GEN SQG NR

Facility Filed As: (S/T) LDF Trans GEN SQG NR

7. Date of evaluation covered by this report

12/2/88

(if different from #5 above)

- 7a. Eval Comment: \_\_\_\_\_

8. CLASS AND VIOLATIONS:

VIOLATIONS AND RELEASES

Key:

- X = Violations, no specialties  
B = Violations and specialty  
S = Same violation or specialty  
Z = Pending determination  
O = No violation or specialty found

SPECIALTIES:

- I = No insurance only  
C = CA Schedule Violation  
H = High Priority Violation  
\* = Class I only

GWM	C/PC	FIN	PT B	CMPL	MAN	OTH	L BAN	
		0						class one
		0						class two
X	X	X	X	X	X	X	X	
S	S	S	S	S	S	S	S	
Z	Z	Z	Z	Z	Z	Z	Z	
O	O	O	O	O	O	O	O	
H	H	H	H	H	H	H	H	
		I*		C				
		B*		B				

- 8a. Viol. Comment: RTC

RESP AGENCY: E=USEPA  
S= STATE  
X= OVERSIGHT

9. ENFORCEMENT ACTIONS:

CLASS	AREA OF VIOL	ACTION TYPE	DATE OF ACTION	COMPL SCHED	COMPL ACTUAL	PENALTY ASSESSED	PENALTY COLLECTED	RESP AGENCY
1	Fin	3	8/25/88	9/26/88	12/2/88			5

Codes for Types of Enforcement Actions:

- 01 = Interim Status Compliance Letter  
02 = '3007 Information Request  
03 = Warning Letter  
04 = Administrative Complaint  
05 = Final Administrative Order  
06 = 3013 Admin Order (initial) /State equiv.  
07 = 3013 Admin Order (final) /State equiv.

- 08 = 7003 Admin Order / State equiv.  
10 = Informal Action  
11 = Filed Civil Action  
12 = Filed Criminal Action  
13 = NOV to State (Viol ref'd for St action)  
14 = NOV to EPA (Viol ref'd for EPA action)  
15 = CA Initial Administrative Order  
16 = CA Final Administrative Order

- 17 = CERCLA 106 Admin Order (EPA)  
18 = Civil Referral to St AG / USDOJ  
19 = Final Judicial Order  
20 = CERCLA 106 fund financed activity  
21 = Notice of Non-compliance  
22 = Fed. Facility Compliance Agreement  
23 = Fed Facility Referral to USEPA HQ  
85 = Insp. referred to USEPA (land ban)

10. Enforcement Comment: \_\_\_\_\_

RTC



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
R. CAROLLO  
ACOB A. HOEFER  
STEPHEN F. MONSMA  
HILARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

November 15, 1984

Karen Page  
Allied Chemical Corp. Detroit Tar Plant  
1200 Zug Island Road  
P.O. Box 33950  
Detroit, MI 48232

RE: MID 005517198

Dear Ms. Page:

On November 9, 1984, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 1200 Zug Island Road, Detroit, Michigan, to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

I have determined that your facility has no deficiencies of the requirements of RCRA in the areas reviewed during that inspection.

Though not deficiencies, I do have the following suggestions:

1. Combine the Spill Prevention, Control and Countermeasures Plan (SPCC), and Contingency plan to incorporate the requirements of each plan (see 265.52(b)). If this is not possible, reference the SPCC and Emergency Action Plan in the Contingency plan is such incidences where contingency plan required content are found in other plans, i.e., evacuation plan.
2. Note on the site plan where the Hazardous Waste is located. Note that the contingency plan will need an update due to the upcoming departure of Steve Bivane.
3. Confirm that Inland Waters has properly marked the Roll-off Box #103 before it leaves your facility to dispose of the Hazardous Waste.

Thank you for the cooperation during my visit.

Sincerely,

Lynne King  
HAZARDOUS WASTE DIVISION

cc: U.S. EPA, Region V  
B. Okwumabua





# RCRA Inspection Report

EPA Identification Number: M I D 0 0 5 5 1 7 1 9 8

Installation Name: Allied Chemical Corp Detroit Tar Plant

Location Address: 1200 Zug Island Rd. P.O. Box 33950

City: Detroit

State: Mi 48222

Date of inspection: 11/09/24

Time of inspection (from) 10:20 (to) 12:00

Person(s) interviewed

Title

Telephone

Karen Page

Superior Lab/Env/Gen Eng 313-842-4400

Inspector(s)

Agency/Title

Telephone

Lynne King

HWJ / MDNR

313 457-9180

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

INLAND WATERS TRANSPORTER

Wayne Disposal - Disposal site

WASTES: GALTAR

CREASOTE W501

NAPHTHALENE W105

WASTEWATER TREATMENT K035

SLUDGE

WASTE PLACED IN 20yd Roll-off Box - LOCATED ON CEMENT -  
ROOFED PAD. NO STORAGE OVER 90 DAYS.



# INSPECTION FORM A

## Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

### Permit application process(es) (EPA Form 3510-3)      Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

### Other activities

GENERATOR	<input type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

*NONE*

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

*See JANUARY '83 REPORT*



Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	_____	_____	_____	NA
b. Facility expansion?	_____	_____	_____	NA
c. Change of owner or operator?	_____	_____	_____	NA
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	_____	_____	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	_____	_____	LAST ANALYSIS July 83 USUALLY HANDLED YEARLY ANALYZED IN ACCORDANCE WITH 261 RATIOS & HISTORY - EPA COMPL REPORT
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	_____	_____	_____	NA
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>	_____	_____	
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>	_____	_____	fenced & locked
and				
ii. Controlled entry?	<u>X</u>	_____	_____	Guard at Gate - 24hrs
c. Danger sign(s) at entrance?	<u>X</u>	_____	_____	41 Entrance
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	_____	_____	

\*Not Inspected



	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				<u>NA</u>
ii. safety and emergency equipment?	<u>X</u>			<u>HANDLED BY SAFETY DEPT.</u>
iii. security devices?	<u>X</u>			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<u>X</u>			<u>Soddes/pumps etc.</u> <u>790 day storage</u>
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>			<u>daily</u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>			
ii. the name of the inspector?	<u>X</u>			
iii. a notation of the observations made?	<u>X</u>			<u>will check if OK</u> <u>will be needed</u> <u>HOWEVER WILL HAVE</u> <u>INLAND PROPERLY MARK</u> <u>Roll off box</u>
iv. the date and nature of any repairs or remedial actions?	<u>X</u>			
5. Do personnel training records include: 265.16				
a. Job titles?	<u>X</u>			
b. Job descriptions?	<u>X</u>			





	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	<u>X</u>	—	—	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u>yes</u>			LAST TRAINING - 7/16/84
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	—	—	—	_____
b. No smoking signs?	—	—	—	_____
c. Separation and protection from ignition sources?	—	—	—	_____



Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation  
of Facility: 265.31

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

YES NO NI Remarks

— Y —

2. If required, does the facility  
have the following equipment: 265.32

a. Internal communications or  
alarm systems?

Y — —

b. Telephone or 2-way radios  
at the scene of operations?

Y — —

WALKIE/TALKIES ON PRODUCTION  
GROUP

c. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

Y — —

Indicate the volume of water and/or foam available for fire control:

2500 gpm — 300 psi — Hydrants Hooked To River  
DETROIT FIRE STATION NEAR

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

Y — —

b. Is emergency equipment  
maintained in operable  
condition?

Y — —

FIRE EXTINGUISHERS - CONTRACT  
200 PACKS - LAST INSPEC. 10/21/84

4. Has owner or operator provided  
immediate access to internal  
alarms? (if needed) 265.34

Y — —

5. Is there adequate aisle space  
for unobstructed movement?

Y — —

6. Has the owner or operator attempted  
to make arrangements with local  
authorities in case of an emergency  
at the facility?

— — —

OFFICE  
LETTER STATING ARRANGEMENTS  
NOT NECESSARY - ONLY ONE  
CONTAINER OF HAZARDOUS  
WASTE. 4/82-A



Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<u>X</u>			Dep for Contingency plan found in one in part of ALL THREE PLANS - CONTINGENCY-SPCC - EMERGENCY ACTION PLAN
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?				STAFF ATTEND CAMPTON FIRE TRAINING IN SARINIA SEE SECTION 6 3 DAY / WEEK CLINIC ON SITE
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u>X</u>			NEEDS UPDATE SOON
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<u>X</u>			AS UPCOMING CHANGE IN PERSONNEL
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<u>X</u>			EMERGENCY ACTION PLAN
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<u>X</u>			AT SITE - FORMERS / GROUP LEADERS OFFICES

D-1 SHOULD NOTE LOCATION 4/82-A OF HAZARDOUS WASTE BOX ON SITE PLAN.



YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

Y

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

Y

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

Y

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

NA.





Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES NO NI Remarks

**\*\* 1. Use of Manifest System 265.71**

a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

NO OFF SITE WASTE

b. Are records of past shipments retained for 3 years?

\_\_\_\_\_

**\*\* 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72**

\_\_\_\_\_

**\*\* Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.**

**3. Operating Record 265.73**

a. Does the owner or operator maintain an operating record as required in 265.73?

Y \_\_\_\_\_

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

Y \_\_\_\_\_

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

Y \_\_\_\_\_

**\*\*\*iii. A map or diagram of each cell or disposal area**

\*\*\* only applies to disposal facilities



YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

v. Reports detailing all incidents that required implementation of the Contingency Plan?

vi. All closure and post-closure costs as applicable?

#### 4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

#### 5.\*\*Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

\*\* Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.



Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES   NO   NI   Remarks

1. Closure    265.112

- |   |             |             |             |   |
|---|-------------|-------------|-------------|---|
| a. Is the facility closure plan available for inspection? | <u>X</u>    | <u>    </u> | <u>    </u> | <u>Closure PLAN - Remove</u><br><u>STABILIZE WASTES</u> |
| b. Does the plan identify:                                |             |             |             |   |
| i. maximum extent unclosed during facility life?          | <u>    </u> | <u>    </u> | <u>    </u> | <u>NA</u>   |
| ii. maximum hazardous waste inventory?                    | <u>X</u>    | <u>    </u> | <u>    </u> | <u>    </u>   |
| iv. estimated year of closure?                            | <u>X</u>    | <u>    </u> | <u>    </u> | <u>    </u>   |
| v. schedule of closure activities?                        | <u>X</u>    | <u>    </u> | <u>    </u> | <u>    </u>   |
| c. Has closure begun?                                     | <u>    </u> | <u>X</u>    | <u>    </u> | <u>    </u>   |

~~2. Post-Closure    265.118~~

- |  |             |             |             |             |
|--|-------------|-------------|-------------|-------------|
| a. Is the post-closure plan available for inspection?  | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| b. Does this plan contain:   |             |             |             |             |
| i. description of groundwater monitoring activities and frequencies?                                 | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| ii. description of maintenance activities and frequencies for  |             |             |             |             |
| AA. integrity of cap, final cover, or containment structures, where applicable                       | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| BB. facility monitoring equipment  | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| iii. name, address, and phone number of person or office to contact during post-closure care period? | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| c. Has the post-closure period begun?  | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |
| d. Is the written post-closure cost estimate available?    265.144                                   | <u>    </u> | <u>    </u> | <u>    </u> | <u>    </u> |

\*Applies only to disposal facilities.



Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>Y</u>	___	___	Roll-off Box - Island #100 Needs Co. Name and location lettering
2. Are containers compatible with waste in them? 265.172	<u>Y</u>	___	___	___
3. Are containers managed to prevent leaks? 265.173	<u>Y</u>	___	___	___
4. Are containers stored closed?	___	___	___	Roll-off Box
5. Are containers inspected weekly for leaks and defects.	<u>Y</u>	___	___	DAILY
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	___	___	___	___
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	___
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	___





# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192  
 \_\_\_\_\_
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?  
 \_\_\_\_\_
3. Do continuous feed systems have a waste-feed cutoff?  
 \_\_\_\_\_
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193  
 \_\_\_\_\_
5. Are required daily and weekly inspections done? 265.194  
 \_\_\_\_\_
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198  
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  
 \_\_\_\_\_
7. Are incompatible wastes stored in separate tanks? 265.199  
 (If not, the provisions of 40 CFR 265.17(b) apply.)  
 \_\_\_\_\_
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)



Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	_____	_____	_____	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____



# Appendix GN

## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>20</u>				from May 1 To present - Hauler - 1 Dump TSD - Wayne Disposal
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>NA</u>				



Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>✓</u>	—	—	—
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<u>✓</u>	—	—	—
3. If required, are placards available to transporters of hazardous waste? 262.33	<u>✓</u>	—	—	—
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<u>✓</u>	—	—	WASTES COLLECTED IN Large Box AT WORK STATION & DUMPED INTO Rolloff Box
b. Have more than 90 days elapsed since the date inspected in (a)?	—	<u>✓</u>	—	—
c. Do wastes remain in accumulation tanks for more than 90 days?	—	<u>✓</u>	—	No TANKS - USE Rolloff Box
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<u>✓</u>	—	—	—

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<u>✓</u>	—	—	—

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	—	<u>✓</u>	—	—
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				





	YES	NO	NI	Remarks
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				



STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING

BOX 30028

LANSING, MI 48909

~~HOWARD A. FANNER, Director~~

Ronald Skoog, Director

Hazardous Waste Division

9311 Groh Road

Grosse Ile, Michigan 48138

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER

ROBERT HOLMES

E. M. LAITALA

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PAUL H. WENDLER

HARRY H. WHITELEY

November 8, 1983

Mr. Steven Bivone  
Superintendent, Technical & Engineering  
Allied Chemical Corporation, Detroit Tar Plant  
1200 Zug Island Road  
P.O. Box 33950  
Detroit, Michigan 48232

Re: MID 005517198

Dear Mr. Bivone:

Your facility was inspected on October 11, 1983 to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The facility generates, accumulates and can store hazardous waste and is subject to the Act.

No violations of the RCRA generator or interim status standards were observed.

Thank you for your cooperation. Feel free to contact me at (313) 675-0860 if you have any questions.

Sincerely,

*William E. Stone*

William E. Stone  
Water Quality Specialist  
Compliance Section  
Hazardous Waste Division

WES/sc

cc: Ken Burda (3)



# RCRA Inspection Report

EPA Identification Number: MI D 005517198

Installation Name: Allied Chemical Corp. Detroit Tar Plant

Location Address: 1200 Zug Island Rd. - P.O. Box 33950

City: Detroit

State: Mi. 48232

Date of inspection: 10/11/83

Time of inspection (from) 2:15 p (to) 3:30 p

Person(s) interviewed

Title

Telephone

Mr. Steven Bivone

Superintendent

313) 842-4400

Technical & Engineering

Inspector(s)

Agency/Title

Telephone

William E. Stone

MIHWD / WQS

313) 675-0860

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

The plant produces pitch, creosote oil and naphthalene oil from coke oven tar. A solid hazardous waste is generated from the manufacturing process. The company classifies the waste as K035-U051 (spill residue). The waste is placed in a 20 ft<sup>3</sup> roll-off box licensed by the transporter, Indland Waters. The box is located on a roofed concrete pad. The material is land filled at Wayne Disposal. They have interim status as a storage facility but have not accumulated over 90 days.

cc: Ken Burda(3)

Allied



# INSPECTION FORM A

## Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)      Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

### Other activities

GENERATOR	<input type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

*None*

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

*See January 83 report*

cc: Ken Burda (3)  
*Allied*





Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				<u>NA</u>
b. Facility expansion?				<u>NA</u>
c. Change of owner or operator?				<u>NA</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				<u>NA do not accept waste from offsite</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>			
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>			
and				
ii. Controlled entry?	<u>X</u>			
c. Danger sign(s) at entrance?	<u>X</u>			<u>At HWMF</u>
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>			

\*Not Inspected



	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	<u>  </u>	<u>  </u>	<u>  </u>	<u>NA</u>
ii. safety and emergency equipment?	<u>X</u>	<u>  </u>	<u>  </u>	<u>Seperate-Safety Dept</u>
iii. security devices?	<u>X</u>	<u>  </u>	<u>  </u>	<u>Seperate-Plant Protection</u>
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
d. Are areas subject to spills inspected daily when in use?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
ii. the name of the inspector?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
iii. a notation of the observations made?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
iv. the date and nature of any repairs or remedial actions?	<u>  </u>	<u>  </u>	<u>  </u>	<u>none needed</u>
5. Do personnel training records include: 265.16				
a. Job titles?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
b. Job descriptions?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>



	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	<u>X</u>	—	—	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u>X</u>	—	—	<u>6/83</u>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	—	—	—	_____
b. No smoking signs?	—	—	—	_____
c. Separation and protection from ignition sources?	—	—	—	_____



Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation  
of Facility: 265.31

YES	NO	NI	Remarks
-----	----	----	---------

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

2. If required, does the facility have the following equipment: 265.32

a. Internal communications or alarm systems?

b. Telephone or 2-way radios at the scene of operations?



c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control:

2500 gpm @ 300 psi

Detroit Fire Station nearby

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

b. Is emergency equipment maintained in operable condition?

4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34



5. Is there adequate aisle space for unobstructed movement?

**X**

6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

X

letter documenting formal  
arrangements not necessary.  
Do give fire tours





Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

Does the Contingency Plan contain the following information: 265.52

- |  |   |   |   |  |
|--|---|---|---|--|
| a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) | X | — | — |  |
| b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?  | X | — | — | <i>letter documenting that material is such that arrangements not necessary. Have own fire</i> |
| c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?  | X | — | — |  |
| d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?  | X | — | — |  |
| e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)  | X | — | — |  |
| 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53  | X | — | — | <i>at site</i>   |



	YES	NO	NI	Remarks
Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	<u>X</u>	___	___	_____
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	___	___	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	___	___	_____
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	___	___	___	<u>NA.</u>



Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

YES NO NI Remarks

\* Use of Manifest System 265.71

a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

— — —

Do not accept off-site waste

b. Are records of past shipments retained for 3 years?

— — —

\*\* 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72

— — —

(\*\*) Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

3. Operating Record 265.73

a. Does the owner or operator maintain an operating record as required in 265.73?

X — —

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?

X — —

one waste - from manifests

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

X — —

one waste - one HWMF

(\*\*\*) i. A map or diagram of each cell or disposal area

\*\*\* only applies to disposal facilities



showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

iv. Records and results of all waste analyses, ~~trial tests,~~ ~~monitoring data,~~ and operator inspections?

v. Reports detailing all incidents that required implementation of the Contingency Plan?

vi. All closure and post closure costs as applicable?

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

5.\*\*Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

(\*\*) Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.





Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	_____	_____	_____	_____
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	_____	_____	_____	_____
If "yes", skip to number 12.				
If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	_____	_____	_____	_____
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	_____	_____	_____	_____
Indicate the total number of downgradient wells.				
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	_____	_____	_____	_____



Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?				
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?				
b. Sample preservation and shipment?				
c. Analytical procedures?				
d. Chain of custody control?				
5. Does the owner or operator follow his groundwater sampling and analysis plan?				
6. Is the groundwater sampling and analysis plan maintained at the facility?				
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?				



	YES	NO	NI	Remarks
8. Has the owner or operator developed an <u>outline</u> of a comprehensive ground-water quality assesment program that is capable of determining: 262.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	—	—	—	—
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	—	—	—	—
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	—	—	—	—
*9. Has the owner or operator performed a statistical analysis of his ground-water monitoring data as required in 265.93(b)?	—	—	X	—
*10. Was there a statistically significant increase (or pH decrease) detected in any well?	—	—	X	—
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?	—	—	X	—
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?	—	—	—	—
a. Is the waiver demonstration maintained at the facility?	—	—	—	—
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	—	—	—	—

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

\*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.



	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	_____	_____	_____	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	_____	_____	_____	_____

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	_____	_____	_____	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	_____	_____	_____	_____





Section G CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

X

b. Does the plan identify:

i. maximum extent unclosed during facility life?

NA

ii. maximum hazardous waste inventory?

X

iv. estimated year of closure?

X

v. schedule of closure activities?

X

c. Has closure begun?

X

\*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

BB. facility monitoring equipment

iii. name, address, and phone number of person or office to contact during post-closure care period?

c. Has the post-closure period begun?

d. Is the written post-closure cost estimate available? 265.144

Applies only to disposal facilities.



Section I - USE AND MANAGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<u>X</u>	___	___	<u>roll-off box</u>
2. Are containers compatible with waste in them? 265.172	<u>X</u>	___	___	___
3. Are containers managed to prevent leaks? 265.173	<u>X</u>	___	___	___
4. Are containers stored closed?	___	___	___	<u>roof over HWMF</u>
5. Are containers inspected weekly for leaks and defects.	<u>X</u>	___	___	<u>is to be completed by 4/1/83.</u>
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	___	___	___	<u>NA</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	<u>NA</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	<u>NA</u>



Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
3. Do continuous feed systems have a waste-feed cutoff?  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
5. Are required daily and weekly inspections done? 265.194  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198  
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
7. Are incompatible wastes stored in separate tanks? 265.199  
 (If not, the provisions of 40 CFR 265.17(b) apply.)  

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)



Section K - SURFACE IMPOUNDMENTS (Part 265, subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	_____	_____	_____	_____
2. Do earthen dikes have protective covers? 265.224	_____	_____	_____	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	_____	_____	_____	_____
4. Is the freeboard level inspected at least daily? 265.226	_____	_____	_____	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	_____	_____	_____	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	_____	_____	_____	_____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	_____	_____	_____	_____





Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	_____	_____	_____	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____



Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.270	_____	_____	_____	_____
2. Are run-off and run-on diverted from the facility or collected	_____	_____	_____	_____
3. Is waste analyzed according to 265.273?	_____	_____	_____	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	_____	_____	_____	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	_____	_____	_____	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	_____	_____	_____	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	_____	_____	_____	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	_____	_____	_____	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	_____	_____	_____	_____



Section N - LANDFILLS (Part 265, Subpart N)

YES   NO   NI   Remarks

1. General Operating Requirements 265.302  
Does the facility provide the following:

a. Diversion of run-on away from active portions of the fill?

\_\_\_\_\_

b. Collection of run-off from active portions of the fill?

\_\_\_\_\_

c. Is collected run off treated?

\_\_\_\_\_

d. Control of wind dispersal of hazardous waste?

\_\_\_\_\_

2. Surveying and Recordkeeping 265.309  
Does the Operating Record Include:

a. A map showing the exact location and dimensions of each cell?

\_\_\_\_\_

b. The contents of each cell and the location of each hazardous waste type within each cell?

\_\_\_\_\_

3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312

\_\_\_\_\_

4. Special Requirements for Incompatible Wastes. 265.313

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.



YES NO NI Remarks

5. Special requirements for liquid waste  
265.314

a. Are bulk or non-containerized liquids placed in the landfill?  
If "yes," complete items i, ii, and iii.

i. Does the landfill have a chemically and physically resistant liner system?

ii. Does the landfill have a functional leachate collection system?

iii. Are free liquids stabilized prior to or immediately after placement in the landfill?

b. Have containers holding free liquids been placed in landfill since March 22, 1982?

6. Special requirements for Containers  
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? 265.315





Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1 Determination of Steady State I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value	_____	_____	_____	_____
Halogen content	_____	_____	_____	_____
Sulfur content	_____	_____	_____	_____

ii. Has documented or written data been substituted for analysis of either:

Lead?	_____	_____	_____	_____
Mercury:	_____	_____	_____	_____



- b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. <u>Monitoring and Inspections</u> I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
b. Is steady state maintained or corrections attempted?	_____	_____	_____	_____
c. Is stack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	_____	_____	_____	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	_____	_____	_____	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____
**Specify in Remarks for what period of time this was checked.				
g. Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____
4. <u>Open Burning</u> T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	_____	_____	_____	_____



YES NO NI Remarks

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft



Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.





## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. 24				16 yds per shipment
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				Hauler - Inland Waters Disposer - Wayne Disposal
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. NA				



Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	___	___	___
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<u>X</u>	___	___	___
3. If required, are placards available to transporters of hazardous waste? 262.33	<u>X</u>	___	___	___
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<u>X</u>	___	___	However, are complying as generator
b. Have more than 90 days elapsed since the date inspected in (a)?	___	<u>X</u>	___	___
c. Do wastes remain in accumulation tanks for more than 90 days?	___	___	___	NA
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<u>X</u>	___	___	___

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<u>X</u>	___	___	___

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	___	<u>X</u>	___	___
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				



	YES	NO	NA	Remarks
i. Notified the Administrator in writing?				
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
iii. Met the Manifest requirements?				
b. Importing Hazardous Waste; has the generator met the manifest requirements?				



STATE OF MICHIGAN



#1325

URAL RESOURCES COMMISSION

JACOB A. HOEFER  
CARL T. JOHNSON  
E.M. LAITALA  
HILARY F. SNELL  
HARRY H. WHITELEY  
JOAN L. WOLFE  
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

STEVENS T. MASON BUILDING  
BOX 30028  
LANSING, MI 48909

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director  
Hazardous Waste Management Division  
Detroit Area  
9311 Groh Road  
Grosse Ile, Michigan 48138

January 10, 1983

Mr. Steve Bivone  
Superintendent, Technical & Engineering  
Allied Chemical Corporation, Detroit Tar Plant  
1200 Zug Island Road  
P.O. Box 33950  
Detroit, Michigan 48232

Re: MID005517198

Dear Mr. Bivone:

On January 4, 1983, your facility was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The facility generates a hazardous waste, waste creosote, and is subject to the Act.

No violations of RCRA were found during the inspection

Thank you for your cooperation. Please contact me at (313) 675-0860 if you have any questions.

Your truly,

HAZARDOUS WASTE MANAGEMENT DIVISION

*William E. Stone*

William E. Stone  
Water Quality Specialist

WES/sc

cc: Al Howard (2)

RECEIVED  
JAN 14 1983  
ACT 64







#1325

RCRA Inspection Report

EPA Identification Number: M I D 005517198

Installation Name: Allied Chemical Corp. Detroit Tar Pth.

Location Address: 1200 Zug Island Rd. (P.O. Box 33950)

City: Detroit

State: Mich. 48232

Date of inspection: 1/4/83

Time of inspection (from) 1:30p (to) 4p

Person(s) interviewed

Title

Telephone

Steven Bivone

Superintendent

313) 842-4400

Technical and Engineering

Inspector(s)

Agency/Title

Telephone

William E. Stone

MI DNR-HWD/wgs

313) 675-0860

Installation Activity (mark only one box)

Inspection Form(s)

☒ Treatment/Storage/Disposal per 40 CFR 265.1 and/or  
Generation and/or Transportation

A

☐ Treatment/Storage/Disposal (no generation or Transportation)

A

☐ Generation and Transportation

B, C

☐ Generation only

B

☐ Transportation only

C

cc: Al Howard (2)  
allied

RECEIVED

JAN 14 1983

ACT 64



RCRA Inspection Report

Allied Chemical Corporation  
Detroit Tar Plant  
1200 Zug Island Road  
Detroit, Michigan 48232

MID 005517198

The facility produces pitch, creosote oil and mapthalene oil from coke oven tar. All waste (K035,u051) is solidified process spill residues. The waste is placed in a 20 yrd. roll off unit, accumulated (so far, always less than 90 days) until unit is full and then taken to Wayne Disposal by a licensed hauler.

sc

cc: Al Howard (2)

Allie &

7

11

STATE IDENTIFICATION NUMBER  
(If Applicable)

MID 00551798  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: ALLIED CHEMICAL CORP. DETROIT TAR PLANT
- (b) Street: 1200 ZEE ISLAND ROAD
- (C) City: DETROIT (D) State: MICH. (E) Zip Code: 48232
- (F) Phone: 313-842-4400 (G) County: WAYNE
- (H) Operator: ~~SAME~~ ALLIED CORPORATION, ALLIED CHEMICALS CO.
- (I) Street: P.O. 1139 R.
- (J) City: MORRISTOWN (K) State: NEW JERSEY (L) Zip Code: 07960
- (M) Phone: <sup>201-</sup>455-5000 (WATS LINE) (N) County: MORRIS
- (U) Owner: SAME AS OPERATOR
- (P) Street: \_\_\_\_\_
- (Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_
- (T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_
- (V) Date of Inspection: DEC. 8, 1981 (W) Time of Inspection (From) 2:15 P.M. (To) 4:00 P.M.
- (X) Weather Conditions: 30°, STEADY WIND, LIGHT SNOW, OVERCAST



(Y)	Person(s) Interviewed	Title	Telephone
	MR. KENNETH BURROWS	PLANT MANAGER	313-292-9400
	MR. MARK KAMILOW	PROCESS ENGINEER/ENVIRONMENTAL	313-292-4400
	MR. STEVEN BIVONE, SUPERVISOR, TECHNICAL, ENVIRONMENTAL & REG. SERVICES		SAME AS ABOVE
	MS. KAREN S. NOVAK, ENGINEER		SAME
<hr/>			
(Z)	Inspection Participants	Agency/Title	Telephone
	SUSAN NORTON	MICH. DEPT. OF NATURAL RESOURCES, WATER QUALITY DIVISION	313-379-9692
	WILLIAM STONE	" " " " " "	" " " " " "
<hr/>			
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	SUSAN NORTON	SAME AS ABOVE	SAME AS ABOVE

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> A. Storage and/or Treatment | <input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)   |
| 1. Containers (I)   |   |
| 2. Tanks (J)  |   |
| 3. Surface Impoundments (K)                                     |   |
| 4. Waste Piles (L)  | <input checked="" type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)   |
| <input type="checkbox"/> B. Lagoon Treatment (M)                | FOR WASTEWATER ONLY - THIS IS DISCHARGED TO SANITARY SEWER, PRESENTLY THIS IS A PROPOSED WASTE: "PROCESS WASTE WATER FROM CREDIBITE PRODUCTION." (40CFR 261(B)) |
| <input type="checkbox"/> C. Landfills (N)                       |   |

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.





### III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?				NOT APPLICABLE
2. Facility expansion?				NOT APPLICABLE
(b) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
2. Does the owner or operator have detailed waste analysis plan on file at the facility?	X			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				NOT APPLICABLE
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X			
2. Artificial or natural barrier around facility?	X			
3. Controlled entry?	X			
4. Danger sign(s) at entrance?	X			
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?				NO PROBLEMS SO FAR, THEREFORE NOT AP
2. Records of operator error?				
3. Records of discharges?				



# III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	<u>X</u>			
5. Safety, emergency equipment?	<u>X</u>			
6. Security devices?	<u>X</u>			
7. Operating and structural devices?	<u>X</u>			
8. Inspection log?	<u>X</u>			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	<u>X</u>			
2. Job Descriptions?	<u>X</u>			
3. Description of Training?	<u>X</u>			
4. Records of Training?	<u>X</u>			
5. Have facility personnel received required training by 5-19-81?	<u>X</u>			
6. Do new personnel receive required training within six months?	<u>X</u>			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?				<u>NOT APPLICABLE</u>
2. No smoking signs?				" "
3. Separation and protection from ignition sources?				" "

\*Not Inspected



IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Yes No N/A

REMARKS

1. Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

X — —

ONLY MINOR SPILLAGE ~~ON~~ ON CONCRETE  
Paved By CONTAINER — A SINGLE 20 CUBIC  
YARD BOX WITH OPEN TOP

(B) If required, does the Facility  
have the Following Equipment:

1. Internal communications or  
alarm systems?
2. Telephone or 2-way Radios  
at the scene of operations?
3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

X — —

X — —

X — —

Indicate the volume of water and/or foam available for fire control:

Units: 2500 G.P.M. AT APPROX. 300 PSI (FROM ROUGE RIVER); FOAM IS AVAILABLE FROM CITY OF  
DETROIT — SOURCE IS 2 BLOCKS AWAY

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the Owner or Operator  
established Testing and  
Maintenance Procedures  
for Emergency Equipment?
2. Is Emergency Equipment  
Maintained in Operable  
Conditions?

X — —

X — —

(D) Has Owner or Operator Provided  
Immediate Access to Internal Alarms?  
(if needed)

X — —



Yes

(E) Is there adequate aisle space  
for unobstructed movement?

X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel  
must take to comply with  
§265.51 and 265.56 in response  
to fires, explosions, or any  
unplanned release of hazardous  
waste? (If the owner has a Spill  
Prevention, Control, and Counter-  
measures (SPCC) Plan, he needs  
only to amend that plan to  
incorporate hazardous waste  
management provisions that are  
sufficient to comply with the  
requirements of this Part (as  
applicable.)

X

COMPANY HAS SPCC ALSO; THIS IS  
KEPT SEPARATE FROM RCRA CONTINGENCY  
PLAN

2. Arrangements agreed to by local  
police departments, fire departments  
hospitals, contractors, and State  
and local emergency response teams  
to coordinate emergency services  
pursuant to §265.37?

X

ARRANGEMENT FORM HAS BEEN DRAFTED;  
NO OFFICIAL CONTACTS HAVE BEEN  
MADE

3. Names, addresses, and phone  
numbers (office and home) of all  
persons qualified to act as  
emergency coordinators?

X

4. A list of all emergency equipment  
at the facility which includes the  
location and physical description  
of each item on the list and a  
brief outline of its capabilities?

X

5. An evacuation plan for facility  
personnel where there is a possibility  
that evacuation could be necessary?  
(This plan must describe signal(s)  
to be used to begin evacuation,  
evacuation routes, and alternate  
evacuation routes?)

X





## V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?				SITE YES; ORGANIZATIONS No
(c) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	___	___	___
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	___	___	___
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	___	___	___
(d) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	___	___	___	NOT APPLICABLE; NO EMERGENCY HAS OCCURRED

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING  
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u>X</u>	___	___	___
2. Are records of past shipments retained for 3 years	<u>X</u>	___	___	___
(b) Does the owner or operator meet requirements regarding Manifest Discrepancies?	___	___	___	NOT APPLICABLE



VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X    —    —

COMPANY HAS RECORD OF WHAT IS DISCHARGED  
TO CITY SEWER (WASTEWATER FROM  
CREOSOTE PRODUCTION), AS WELL AS  
DISPOSAL OF

2. Does the operating record contain the following information:

SOLID WASTE TO  
CONTRACTED LAND  
FILL

- \*\*b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

X    —    —

- c. The location and quantity of each hazardous waste within the facility?

X    —    —

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers; if waste was accompanied by a manifest.)

X    —    —

NOT APPLICABLE

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

- f. Reports detailing all incidents that required implementation of the contingency plan?

—    —    —

NOT APPLICABLE

- g. All closure and past closure costs as applicable? (Effective 5-19-81)

X    —    —

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



# VIII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	X	—	—	
2. Has this plan been submitted to the Regional Administrator	—	X	—	
3. Has Closure begun?	<del>NI</del>	X	—	
4. Is closure estimate available by May 19, 1981?	X	—	—	
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	—	X	—	NOT APPLICABLE

ALTHOUGH THE FACILITY APPLIED AS A DISPOSAL FACILITY, THEY DO NOT QUALIFY BECAUSE TREATED WASTE DOES NOT REMAIN AT THE SITE. SEE 40 CFR, MAY 19, 1980, SECTION 260, II SUBPART B, 2: "DEFINITIONS OF DISPOSAL & DISPOSAL FACILITY" (p3306B).

## IX. FACILITY STANDARDS (Part 265, Subparts I thru R)

### I USE AND MANAGEMENT OF CONTAINERS

Facility Name: ALLIED CHEMICAL CORP DETROIT TAC PLANT Date of Inspection: DEC. 8, 1981

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X	—	—	ONLY 1 CONTAINER IS USED, AND TOP 20 CUBIC FOOT METAL BOX
2. Are containers compatible with waste in them?	X	—	—	
3. Are containers stored closed?	—	X	—	
4. Are containers managed to prevent leaks?	X	—	—	
5. Are containers inspected weekly for leaks and defects?	X	—	—	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	Indicate if waste is: <input type="checkbox"/> Ignitable, <input type="checkbox"/> Reactive			NOT APPLICABLE



	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	<u>NOT APPLICABLE</u>
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	_____	_____	_____	_____

J  
TANKS — NOT APPLICABLE

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	_____	_____	_____	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	_____	_____	_____	_____
3. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	_____	_____	_____	_____
5. Are required daily and weekly inspections done?	_____	_____	_____	_____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
Indicate if waste is: <input checked="" type="checkbox"/> Ignitable <input type="checkbox"/> Reactive				
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____





Yes No NI\* Remarks

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS — NOT APPLICABLE

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

\_\_\_\_\_

2. Do earthen dikes have protective covers?

\_\_\_\_\_

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

\_\_\_\_\_

4. Is the freeboard level inspected at least daily?

\_\_\_\_\_

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

\_\_\_\_\_

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_



L

WASTE PILES — NOT APPLICABLE

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
<i>Indicate if waste is: <input type="checkbox"/> Ignitable, <input type="checkbox"/> Reactive</i>				
5. Are piles of reactive or ignitable waste protected?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____



M

## LAND TREATMENT -- NOT APPLICABLE

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Is hazardous waste <sup>treated</sup> capable of biological or chemical degradation? \_\_\_\_\_
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? \_\_\_\_\_
3. Is waste analyzed according to 265.273? \_\_\_\_\_
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? \_\_\_\_\_
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? \_\_\_\_\_
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? \_\_\_\_\_
7. Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility? \_\_\_\_\_
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? \_\_\_\_\_
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) \_\_\_\_\_

Indicate if waste is: ☐ Ignitable ☐ Reactive



N  
LANDFILLS — NOT APPLICABLE

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	_____	_____	_____	_____
**2. Collection of run-off from active portions of the fill?	_____	_____	_____	_____
**3. Is collected run off treated?	_____	_____	_____	_____
4. Control of wind disposal of hazardous waste?	_____	_____	_____	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	_____	_____	_____	_____
2. The contents of each cell and the location of each hazardous waste type within each cell?	_____	_____	_____	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	_____	_____	_____	_____
2. Has this plan been submitted to the Regional Administrator?	_____	_____	_____	_____
3. Has Closure begun?	_____	_____	_____	_____
4. Is Closure cost estimate available by 5-19-81?	_____	_____	_____	_____
(D) Special requirements <sup>for</sup> ignitable or reactive waste				
Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?				





NOT APPLICABLE

Yes No NI\* Remarks

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

(E) Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

If not, the provisions of 40 CFR 265.17(b) apply.

(F) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

2. Does the landfill have a chemically and physically resistant liner system?

3. Does the landfill have a functional leachate collection system?

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

(G) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?



O and P  
INCINERATION and THERMAL TREATMENT  
*NOT APPLICABLE*

(A) Facility Name: \_\_\_\_\_

(B) Date of Inspection: \_\_\_\_\_

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): \_\_\_\_\_

B. Components and steady state condition:

\*\*\*\* Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____



NOT APPLICABLE

MID 005517198

Yes No

NI\*

Remarks

2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead?

b. Mercury?

- B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

Remarks

1. \_\_\_\_\_  
 2. \_\_\_\_\_  
 3. \_\_\_\_\_  
 4. \_\_\_\_\_  
 5. \_\_\_\_\_

NOT APPLICABLE

III. Monitoring and Inspections

Yes No

NI\*

Remarks

- A. Combustion/emission control instruments monitored at least every 15 minutes
- B. Steady state maintained or corrections attempted?
- C. Stack Plume observed at least hourly for normal color and opacity?
- D. Did any stack observations made by owner or operator show a plume different than normal?\*\*
- E. If yes to D above, were corrections made to return emissions to normal appearance?\*\*
- F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?
- G. Emergency shutdown controls, system alarms checked daily for proper operation?

\*Not Inspected

\*\*Specify in Remarks for what period of time this was checked.



NOT APPLICABLE

210005517198

## IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

- |  | Yes | No | NI* | Remarks |
|--|-----|----|-----|---------|
| 1. Does this facility burn <u>only</u> waste explosives?<br>(A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)                  |     |    |     |         |
| 2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) |     |    |     |         |

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q  
CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT  
(FOR WASTEWATER ONLY)

Facility Name: ALLIED CHEMICAL CORP., DETROIT TAP PLANTDate of Inspection: DEC. 8, 1981

- |   | yes      | No | NI* | Remarks               |
|---|----------|----|-----|-----------------------|
| 1. Is equipment used to treat <u>only</u> those wastes which will not cause leakage, corrosion, or premature failure?       | <u>X</u> |    |     |                       |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?) |          |    |     | <u>NOT APPLICABLE</u> |





	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	<u>NOT APPLICABLE</u>
4. Are inspection procedures followed according to 265.403?	<u>X</u>	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	<u>NOT APPLICABLE</u>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	<u>NOT APPLICABLE</u>

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR 5261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

## IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	<u>X</u>	_____	_____	_____
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	_____	_____	_____



	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	_____	_____	_____
7. Required Certification?	<u>X</u>	_____	_____	_____
8. Required Signatures?	<u>X</u>	_____	_____	_____
(C) Does the Owner or Operator Submit Exception Reports when Needed?	_____	_____	_____	OCCASION MAY NOT YET ARISEN

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site)	<u>X</u>	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site)	<u>X</u>	_____	_____	_____
(C) If required, are placards available to transfer?	_____	_____	_____	NOT APPLICABLE



Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<u>X</u>	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	<u>X</u>	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<u>X</u>	_____	_____	<u>INSPECTION OF CONTAINERS</u> <u>DONE DAILY</u>
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?	<u>NOT APPLICABLE</u>			
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<u>X</u>	_____	_____	_____
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	_____	_____	_____	<u>NOT APPLICABLE</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	_____	<u>X</u>	_____	_____
--	-------	----------	-------	-------

(If A was answered Yes, then complete the following as applicable.)

NOT APPLICABLE

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	_____
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
c. Met the Manifest requirements?	_____	_____	_____	_____
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?	_____	_____	_____	_____

✓





X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	_____	_____	_____	_____
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected



## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

THE PLANT DISTILLS CRUDE COKE OVEN TAR, OBTAINING RESIDUAL PITCHES, CREOSOTE OILS, & NAPHTHALENE-RICH OIL. THERE ARE NO WASTE-STREAMS PRODUCED AS SUCH. ALL WASTE IS SPILL RESIDUES, SAMPLE CAN RESIDUES, LEAKS, ETC. — I.E., LOST PRODUCT. THIS IS SOLIDIFIED AND TAKEN TO A LICENSED LANDFILL (WAYNE DISPOSAL #2).

THE WASTEWATER (PROPOSED "PROCESS WASTEWATER FROM CREOSOTE PRODUCTION") CONSISTS OF NON-CONTACT COOLING WATER, STEAM CONDENSATE, AND STORM WATER RUN-OFF FROM THE ENTIRE PLANT PROPERTY. THIS GOES TO A SURGE TANK. IF IT EXCEEDS DETROIT MUNICIPAL SEWAGE LIMITS FOR PHENOL, IT IS TREATED WITH BACTERIA, THEN RELEASED TO MUNICIPAL SANITARY SEWER.



INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit application process(es) (EPA Form 3510-3)</u>		<u>Inspection Form A section(s)</u>
S01	<input checked="" type="checkbox"/> storage in containers	I
S02	<input type="checkbox"/> storage in tanks	J
T01	<input type="checkbox"/> treatment in tanks	J
S04	<input type="checkbox"/> storage in surface impoundment	K,F
T02	<input type="checkbox"/> treatment in surface impoundment	K,F
D83	<input type="checkbox"/> disposal in surface impoundment	K,F
S03	<input type="checkbox"/> storage in waste pile	L
D81	<input type="checkbox"/> disposal by land application	M,F
D80	<input type="checkbox"/> disposal in landfill	N,F
T03	<input type="checkbox"/> treatment by incineration	O/P
T04	<input type="checkbox"/> treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR ☒ APPENDIX GN  
 TRANSPORTER ☐ APPENDIX TR

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ACT 64

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

N.A.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

line 2 T01 12,000 U  
 line 3 S02 1,000,000 E

Page 3 of 5  
 line 4

cc: Al Howard (2)  
 Alfred

The notification was for a proposed waste (process wastewater from creosote production) that has never been listed and is not a



Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	—	—	—	<u>N.A.</u>
b. Facility expansion?	—	—	—	<u>N.A.</u>
c. Change of owner or operator?	—	—	—	<u>N.A.</u>
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	—	—	
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	—	—	
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>X</u>	—	—	
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<u>X</u>	—	—	
or				
b. i. Artificial or natural barrier around facility?	<u>X</u>	—	—	
and				
ii. Controlled entry?	<u>X</u>	—	—	
c. Danger sign(s) at entrance?	<u>X</u>	—	—	<u>Sign at HWSF</u>
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<u>X</u>	—	—	

\*Not Inspected





YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

X — — in revision to include only 20 yrd

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

— — — N.A.

ii. safety and emergency equipment?

X — — Sep. Sch.

iii. security devices?

X — — Sep. Sch.

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

X — —

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

X — —

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

X — —

d. Are areas subject to spills inspected daily when in use?

X — —

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

X — —

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

X — —

ii. the name of the inspector?

X — —

iii. a notation of the observations made?

X — —

iv. the date and nature of any repairs or remedial actions?

X — —

5. Do personnel training records include: 265.16

a. Job titles?

X — —

b. Job descriptions?

X — —



	YES	NO	NI	Remarks
c. Description of training?	<u>X</u>	—	—	_____
d. Records of training?	<u>X</u>	—	—	_____
e. Did facility personnel receive the required training by 5-19-81?	<u>X</u>	—	—	_____
f. Do new personnel receive required training within six months?	<u>X</u>	—	—	_____
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<u>X</u>	—	—	_____
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	—	—	—	<u>NA</u>
b. No smoking signs?	—	—	—	<u>NA</u>
c. Separation and protection from ignition sources?	—	—	—	<u>NA</u>



Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation  
of Facility: 265.31

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

YES NO NI Remarks

X — —

2. If required, does the facility  
have the following equipment: 265.32

a. Internal communications or  
alarm systems?

X — —

ADT any emerg. outside  
internal fire alarm

b. Telephone or 2-way radios  
at the scene of operations?

X — —

Walky-Talky

c. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

X — —

In house fire Dept.  
Total facility contained

Indicate the volume of water and/or foam available for fire control:

2500 gpm at 300 psi (from Rouge River); City of Det.  
Fire Station - 2 BIKS away - has Foam

3. Testing and Maintenance of  
Emergency Equipment: 265.33

a. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

X — —

b. Is emergency equipment  
maintained in operable  
condition?

X — —

4. Has owner or operator provided  
immediate access to internal  
alarms? (if needed) 265.34

X — —

5. Is there adequate aisle space  
for unobstructed movement?

X — —

6. Has the owner or operator attempted  
to make arrangements with local  
authorities in case of an emergency  
at the facility?

X — —

have arrangements  
and have had tours w/  
Fire - hospital



Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X — — —

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

— — —

*N.A.  
Company fire department  
ADT automatically contacts  
Fire & Police Depts.  
Facility totally contained*

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X — — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X — — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — — —

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

X — — —

*at site only*





YES NO NI Remarks

3. Emergency Coordinator 265.55

a. Is the facility Emergency Coordinator identified?

X

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

X

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

X

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

N/A



Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)				
b. Are records of past shipments retained for 3 years?				
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				N.A.
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	X			as applicable
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X			from manifests
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				N.A.
***iii. A map or diagram of each cell or disposal area				

\*\*\* only applies to disposal facilities



YES NO NI Remarks

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

\_\_\_ \_\_\_ \_\_\_ N.A.

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X \_\_\_ \_\_\_

v. Reports detailing all incidents that required implementation of the Contingency Plan?

\_\_\_ \_\_\_ \_\_\_ N.A.

vi. All closure and post closure costs as applicable?

X \_\_\_ \_\_\_

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

X \_\_\_ \_\_\_

5.\*\*Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?

\_\_\_ \_\_\_ \_\_\_ N.A.

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*\* Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.



Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	_____	_____	_____	_____

If "no", Skip to number 11.

2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	_____	_____	_____	_____
--	-------	-------	-------	-------

If "yes", skip to number 12.

If "no", continue

3. Does the groundwater monitoring system meet the following requirements of 265.91:				
--	--	--	--	--

N.A.

a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	_____	_____	_____	_____
---	-------	-------	-------	-------

Indicate the total number of up-gradient wells.

b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	_____	_____	_____	_____
--	-------	-------	-------	-------

Indicate the total number of downgradient wells.

c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	_____	_____	_____	_____
--	-------	-------	-------	-------





Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	_____	_____	_____	_____
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92	_____	_____	_____	_____
a. Sample collection?	_____	_____	_____	_____
b. Sample preservation and shipment?	_____	_____	_____	_____
c. Analytical procedures?	_____	_____	_____	_____
d. Chain of custody control?	_____	_____	_____	_____
5. Does the owner or operator follow his groundwater sampling and analysis plan?	_____	_____	_____	_____
6. Is the groundwater sampling and analysis plan maintained at the facility?	_____	_____	_____	_____
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	_____	_____	_____	_____



	YES	NO	NI	Remarks
8. Has the owner or operator developed an <u>outline</u> of a comprehensive ground-water quality assesment program that is capable of determining: 262.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?	___	___	___	_____
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?	___	___	___	_____
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?	___	___	___	_____
*9. Has the owner or operator performed a statistical analysis of his ground-water monitoring data as required in 265.93(b)?			<u>X</u>	_____
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			<u>X</u>	_____
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			<u>X</u>	_____
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?	___	___	___	_____
a. Is the waiver demonstration maintained at the facility?	___	___	___	_____
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?	___	___	___	_____

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

\*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.



	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	—	—	—	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	—	—	—	_____

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	—	—	—	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	—	—	—	_____

*N.A.*



Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
<b>1. Closure 265.112</b>				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N.A.
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. estimated year of closure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<b>*2. Post-Closure 265.118</b>				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

\*Applies only to disposal facilities.

N.A.





Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	___	___	___
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	___	___	___
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	___	___	<u>Welded joints - rubber seal on gate</u>
4. Are containers stored closed?	___	___	<u>N.A.</u>	<u>Container is 20yd. roll off</u> <u>no threat of overturning</u> <u>waste is solid no threat</u> <u>from evap, precip or spill.</u> <u>Company is in process of</u> <u>roofing storage area.</u>
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	___	___	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	___	___	___	<u>N.A.</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	___	___	___	<u>N.A.</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	___	___	___	<u>N.A.</u>



Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
3. Do continuous feed systems have a waste-feed cutoff?
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193
5. Are required daily and weekly inspections done? 265.194
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198  
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7. Are incompatible wastes stored in separate tanks? 265.199  
 (If not, the provisions of 40 CFR 265.17(b) apply.)
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

*N.A.*



Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	—	—	—	—
2. Do earthen dikes have protective covers? 265.224	—	—	—	—
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	—	—	—	—
4. Is the freeboard level inspected at least daily? 265.226	—	—	—	—
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	—	—	—	—
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	—	—	—	—
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	—	—	—	—

N.A.



Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

N.A.





Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.270	—	—	—	_____
2. Are run-off and run-on diverted from the facility or collected				
3. Is waste analyzed according to 265.273?	—	—	—	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	—	—	—	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	—	—	—	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	—	—	—	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	—	—	—	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	—	—	—	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	—	—	—	_____

M-1

*NA*

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Section N - LANDFILLS (Part 265, Subpart N)

YES   NO   NI   Remarks

1. General Operating Requirements    265.302  
Does the facility provide the following:

a. Diversion of run-on away from active portions of the fill?

\_\_\_\_\_

b. Collection of run-off from active portions of the fill?

\_\_\_\_\_

c. Is collected run off treated?

\_\_\_\_\_

d. Control of wind dispersal of hazardous waste?

\_\_\_\_\_

2. Surveying and Recordkeeping    265.309  
Does the Operating Record Include:

a. A map showing the exact location and dimensions of each cell?

\_\_\_\_\_

b. The contents of each cell and the location of each hazardous waste type within each cell?

\_\_\_\_\_

3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312

\_\_\_\_\_

4. Special Requirements for Incompatible Wastes. 265.313

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

*N.A.*



YES NO NI Remarks

5. Special requirements for liquid waste 265.314

a. Are bulk or non-containerized liquids placed in the landfill?  
If "yes," complete items i, ii, and iii.

i. Does the landfill have a chemically and physically resistant liner system?

ii. Does the landfill have a functional leachate collection system?

iii. Are free liquids stabilized prior to or immediately after placement in the landfill?

b. Have containers holding free liquids been placed in landfill since March 22, 1982?

6. Special requirements for Containers 265.315  
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

N.A.



Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): \_\_\_\_\_

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

2. Waste Analysis

I 265.345

T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value	_____	_____	_____	_____
Halogen content	_____	_____	_____	_____
Sulfur content	_____	_____	_____	_____

ii. Has documented or written data been substituted for analysis of either:

Lead?	_____	_____	_____	_____
Mercury:	_____	_____	_____	_____

*NA*





- b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. <u>Monitoring and Inspections</u> I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b. Is steady state maintained or corrections attempted?	___	___	___	_____
c. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d. Did any stack observations made by owner or operator show a plume different than normal? **	___	___	___	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance? **	___	___	___	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
**Specify in Remarks for what period of time this was checked.				
g. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____
4. <u>Open Burning</u> T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	___	___	___	_____

*N.A.*



YES NO NI Remarks

- ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

N.A.



Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

YES NO NI Remarks

- |   |     |     |     |       |
|---|-----|-----|-----|-------|
| 1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401      | ___ | ___ | ___ | _____ |
| 2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)? | ___ | ___ | ___ | _____ |
| 3. Has the owner or operator addressed the waste analysis requirements of 265.402?  | ___ | ___ | ___ | _____ |
| 4. Are inspection procedures followed according to 265.403?   | ___ | ___ | ___ | _____ |
| 5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405   | ___ | ___ | ___ | _____ |
| 6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406  | ___ | ___ | ___ | _____ |

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

N.A.



# Appendix GN

## Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>27</u> of <u>~20 yds</u> of solids containing creosote
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0-None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>N.A.</u>				





Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	—	—	—	N.A.
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	—	—	—	N.A.
3. If required, are placards available to transporters of hazardous waste? 262.33	X	—	—	—
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	—	—	—	—
b. Have more than 90 days elapsed since the date inspected in (a)?	—	—	—	—
c. Do wastes remain in accumulation tanks for more than 90 days?	—	—	—	—
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	—	—	—	—

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	X	—	—	—

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	—	X	—	—
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				



	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	_____	_____	_____	_____
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
iii. Met the Manifest requirements?	_____	_____	_____	_____
b. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	_____



Appendix TR

YES NO NI Remarks

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21  
If (5) is "no," skip 6 and 7.
6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

N.A.

